

Children on the margins

December 2024



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Welsh Parliament

Children, Young People and Education Committee

Children on the margins

December 2024



About the Committee

The Committee was established on 23 June 2021. Its remit can be found at:
www.senedd.wales/SeneddChildren

Current Committee membership:



**Committee Chair:
Buffy Williams MS**
Welsh Labour



Cefin Campbell MS
Plaid Cymru



Gareth Davies MS
Welsh Conservatives



Vaughan Gething MS
Welsh Labour



Tom Giffard MS
Welsh Conservatives



Carolyn Thomas MS *
Welsh Labour

* Carolyn Thomas MS is a Member of the Committee but did not participate in this Inquiry.

The following Members attended as substitutes during this inquiry:



Lesley Griffiths MS
Welsh Labour



Julie Morgan MS
Welsh Labour

The following Member also contributed to this inquiry:



Jane Dodds MS
Welsh Liberal Democrats

The following Members were also members of the Committee during this inquiry:



**Former Committee Chair:
Jayne Bryant MS**
Welsh Labour



Hefin David MS
Welsh Labour



James Evans MS
Welsh Conservatives



Heledd Fychan MS
Plaid Cymru



Laura Anne Jones MS
Welsh Conservatives



Jack Sargeant MS
Welsh Labour



Ken Skates MS
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Chair's foreword

Please be advised that this report includes discussions of criminal exploitation and contains content that some readers may find upsetting.

At the start of this Senedd, we agreed to focus on the negative impacts of disadvantage, and to prioritise listening to children who aren't always listened to.

In many ways, this inquiry is the embodiment of those commitments.

The number of children who are subject to the abhorrent exploitation and abuse set out in this report are in the minority. But the experiences of those children can be unimaginably terrible. The exploitation they experience will fundamentally shape their lives. It may fundamentally shape the lives of family members, friends and others living in their communities, too.

Some children will not survive the exploitation and abuse they experience.

During 2022 and 2023 we carried out a detailed inquiry about the care system. In our report, we set out clear and strong evidence that the care system is failing far too many children. We made bold, ambitious and specific recommendations that we believe reflect the scale of change needed to substantively improve the lives of children in care.

This new piece of work shares many of the same themes of our work into the care system. We explore similar risk factors for children entering the care system, such as poverty, abuse, and trauma. And we explore the subsequent consequences of poor corporate parenting once children are in care.

But this inquiry casts a wider net than children in care and their families. There are certain risk factors that make marginalisation more likely. But ultimately, *any* child can become marginalised. *Any* child can go missing, and *any* child can be exploited.

This report can be read as a story of missed opportunities. Missed opportunities to identify and support at risk children. Missed opportunities to have important conversations following the first signs of marginalisation. Missed opportunities to respond effectively when things escalate, and missed opportunities to take decisive action at critical moments.

There are good intentions across the sector, and there are examples of good practice, too. So this report does not call for a revolution in the response to marginalised children. Instead, we are asking professionals to be more aware, more consistent, more focused, to ask more of themselves and of others, and to be held accountable for doing so.

We believe that the recommendations in this report, if accepted and implemented in this Senedd and beyond, will make a real and tangible difference to the lives of our most vulnerable children.

We would like to thank all of the professionals and organisations who sacrificed their valuable time and expertise to submit evidence to us, attend our stakeholder events, and organise engagement visits. We are immensely grateful for your input.

And we would like to extend a special thank you to the young people who we met and who engaged with us throughout this inquiry. We do not underestimate what it took for you to do so. Your views and expertise helped us understand both the personal impact of exploitation, and the systemic failings that make exploitation possible.

Buffy Williams MS

Chair

Recommendations

Recommendation 1. The Welsh Government should work with local authorities and police forces to take robust, immediate action to ensure that the data it publishes relating to children missing from care and missing episodes among children receiving care and support (received from local authorities) are accurate and reliable. The Welsh Government should report back to us within 6 months to provide an update on the issues identified by the partnership and action taken.Page 33

Recommendation 2. The Welsh Government should carry out a feasibility study into the development of data release that is as accurate, reliable and as exhaustive as feasibly possible, covering all episodes of children who go missing in Wales. The data should be broken down separately by age, care experience, local authority, primary reason for going missing (if known), and in conjunction with stakeholders, any other factors the Welsh Government considers useful for policy development purposes.Page 34

Recommendation 3. The Welsh Government should amend legislation to make the offer of a return interview a statutory requirement following each missing episode. The child should have the right to decide who carries out that interview from among a pool of trusted and competent adults, and robust statutory guidance should be issued for practitioners to set out clearly how return interviews should be conducted to ensure consistency across Wales. As part of this guidance, the Welsh Government should create a form for practitioners to use which states whether the offer of a return interview was accepted or rejected, for ease of sharing this data with relevant stakeholders..... Page 36

Recommendation 4. The Welsh Government should write to the UK Government to advocate for a statutory definition of Child Criminal Exploitation as part of its forthcoming Crime and Policing Bill. The Welsh Government should report back to us with the response it receives, which should also include a summary of any relevant inter-governmental discussions that have taken place since September 2024..... Page 58

Recommendation 5. The Welsh Government should set out its views on the benefits or otherwise of a national strategy to respond to Child Criminal Exploitation in light of the concerns raised in this report about inconsistency of practice across Wales..... Page 59

Recommendation 6. In its forthcoming legislation, the Welsh Government should:

- ensure that care experienced children and young people who are, or who are at risk of becoming, homeless retain a legal priority in relation to other categories of homeless applicant; and
- create a mandatory ‘reasonable preference’ category for people who are care experienced (regardless of homelessness status) in local authorities’ social housing allocation schemes.Page 66

Recommendation 7. If the Welsh Government is not willing to keep priority need status for care experienced young people, it should carry out and publish within 6 months of the publication of this report a robust assessment of the impacts of removing priority need status on care experienced people.Page 66

Recommendation 8. The Welsh Government should review the Single Unified Safeguarding Review governance arrangements to ensure that the process:

- includes a clear, efficient and transparent mechanism by which report recommendations are immediately disseminated to every single relevant individual agency across the whole of Wales to implement;
- clearly states whose responsibility it is to make sure that each relevant individual agency is made aware of what they need to do to implement the recommendations;
- clearly states whose responsibility it is to make sure that recommendation *is* implemented; and
- clearly states what enforcement action will be taken if recommendations are not implemented, who will take that enforcement action, and when and how it will be taken.Page 93

Recommendation 9. For each of the six Regional Safeguarding Boards and the National Independent Safeguarding Board, the Welsh Government should publish for the 2023-24 financial year:

- actual meeting dates;
- records of which agencies/organisations attended each meeting; and

- meeting agendas and minutes, including actions agreed (redacted as appropriate).Page 94

Recommendation 10. In its response to this report, the Welsh Government should set out its assessment of the effectiveness of the six Regional Safeguarding Boards and the National Independent Safeguarding Board in bring together local and national partners across statutory and non-statutory agencies, devolved and otherwise, to deliver tangible improvements in safeguarding practice..... Page 94

Recommendation 11. The Welsh Government should work alongside statutory and non-statutory partners, drawing on existing work such as Cardiff University’s Complex Safeguarding Wales Practitioner Toolkit, to develop a set of resources and training materials to improve frontline professionals’ awareness of, and response to, criminal exploitation and the other forms of marginalisation explored in this report. These resources and materials should be targeted at professionals working in a range of settings that have direct contact with vulnerable children (such as social services, housing departments, education establishments, health boards, etc.). The Welsh Government should take steps to ensure that relevant frontline professionals across the statutory sector – including those employed by organisations commissioned by the statutory sector, such as charities - receive that training..... Page 96

Recommendation 12. The Welsh Government should work alongside health boards, police forces and other relevant statutory and non-statutory agencies to develop a pan-Wales child criminal exploitation risk assessment tool for use by frontline staff, including in healthcare settings. The rollout of the risk assessment tool should be accompanied by the programme of training and awareness raising that we advocate in Recommendation 11..... Page 97

Recommendation 13. The Welsh Government should explore the feasibility of a Wales-wide safeguarding information sharing platform, such as the West Glamorgan Safeguarding Board tracker, to improve information sharing across Wales..... Page 97

Recommendation 14. In its response to our report, the Welsh Government should set out in detail its understanding of the impact of data protection legislation on multi-agency working in relation to safeguarding vulnerable children to help both statutory and non-statutory bodies understand their data protection obligations when working together to support marginalised children and their families..... Page 98

Recommendation 15. In its response to this report, the Welsh Government should provide an update on the long-term future of the Wales Police Schools Programme, outlining what, if any, centrally funded provision will replace this vital initiative..... Page 99

Recommendation 16. In its response to this report, the Welsh Government should set out its views on the merits or otherwise of specialist teams within social services departments that work with children who go missing, and/are sexually and/or criminally exploited..... Page 100

Recommendation 17. The Welsh Government should update exclusion guidance for schools to reflect the wider risk factors of exploitation, as explored in this report, and ensure all schools are reminded of the potential consequences of exclusion and part-time timetables. Concurrently, the Welsh Government should work with local authorities to develop a bank of examples of where schools have successfully supported vulnerable children to remain in school, sharing those case studies to inform best practice across the sector..... Page 124

Recommendation 18. The Welsh Government should explore and report back to us within six months on the use of the children missing education database for local authorities to identify and safeguard children who are not in education settings and who may, consequently, be at risk of exploitation..... Page 124

Recommendation 19. In its response to this report, and having reflected on the impact (or otherwise) of the voluntary Corporate Parenting Charter on the quality and consistency of services for care experienced children and young people, the Welsh Government should set out:

- what consideration it has given to placing its Corporate Parenting Charter on a statutory footing; and
- any further action it intends to take in relation to corporate parenting, and the timelines for doing so.Page 126

Recommendation 20. In its response to this report, the Welsh Government should set out:

- what support it has provided to local authorities to help them drive/adopt digital innovations that improve communication with children in care; and

- whether it considers that the app used in Denbighshire (or similar platforms used elsewhere) might warrant further investigation, with a view to rolling them out across local authorities nationwide.Page 126

Recommendation 21. In its response to this report, the Welsh Government should set out clearly what progress it has made in establishing a National Guardianship Service for unaccompanied asylum seeking children, and how and by when that work will progress..... Page 127

Recommendation 22. The Welsh Government should take immediate action to better understand the nature and scale of exploitation of neurodivergent children and children with learning disabilities, with a view to working alongside relevant agencies to develop a more effective response to safeguarding these groups of children..... Page 127

Recommendation 23. The Welsh Government should acknowledge:

- the fundamental and inherent links between poverty and the abuse and exploitation of children;
- that, despite the most powerful levers for addressing poverty lying elsewhere, it does have powers to provide support and to safeguard children who are made vulnerable as a result of poverty, and should rightly be held to account for its successes and failures in doing so.Page 128

1. Background

Our inquiry into radical reform of the care system

1. In October 2022, we launched an inquiry about services for care experienced children and young people. In his leadership manifesto, the then First Minister Mark Drakeford MS had committed to reducing the number of children entering the care system.¹ The Welsh Government's subsequent Programme for Government committed the government to "explore radical reform of current services for children looked after and care leavers".² But despite the bold commitments, we weren't clear what "radical reform" meant in practice.
2. Our report, published after extensive engagement with care experienced children and young people, frontline professionals and academics, concluded that:

"Anybody claiming that the state is doing its corporate parenting job well should consider whether they would be happy for their own child to be cared for by that system... Corporate parents in Wales must do much, much better."

We made 27 recommendations to the Welsh Government, including 12 'radical reforms'.³

3. We were deeply disappointed with the Welsh Government's response to our report, which we believe failed to grasp the scale of radical change needed to improve meaningfully the lives of children in the care system and their families.⁴ We committed to carry on pushing for the radical reform that we believe is so desperately needed. Since then, as part of our wider body of work on the care system, we have:

- Exchanged correspondence with local authorities and the Welsh Government to shine a light on concerns raised to us by stakeholders

¹ Mark Drakeford, '[Mark Drakeford for leader](#)', November 2018, page 31

² Welsh Government, '[Programme for Government - Update](#)', January 2021, pages 3 & 9

³ Children, Young People and Education Committee, '[If not now, then when? Radical reform for care experienced children and young people](#)', May 2023, page 6

⁴ Welsh Government, '[Written Response by the Welsh Government to the report of the Children, Young People and Education Committee report entitled "If not now, then when? Radical reform for care-experienced children and young people"](#)', 5 July 2023

about the closure of the Family Drug and Alcohol Court (FDAC) 'problem solving' family court trial in Cardiff and the Vale.⁵

- Responded to the Welsh Government's consultation on its White Paper 'Ending Homelessness in Wales'.⁶ The proposals in the White Paper included removing the overall category of a 'priority need' under homelessness legislation, a category which currently affords priority for accommodation to homeless 18-20 year olds who are care leavers.
- Written to the Health and Social Care Committee to raise concerns about the Health and Social Care (Wales) Bill, which is currently passing through the Senedd.⁷ The Bill will restrict profit-making in the care of children looked after, amongst other things.

4. This report should be viewed within the context of our ongoing commitment to shine a light on the challenges faced by our most vulnerable and marginalised children and young people.

'Children on the margins'

5. During our work on the care system, some stakeholders raised concern about certain children who go missing from care. We heard that these children are particularly vulnerable to being criminally exploited.⁸ These critically important issues fell outside the terms of reference for our inquiry into the care system, so were unable to give them the attention they deserved at that time.

6. We subsequently agreed to carry out a separate inquiry into 'children on the margins', focusing on children who go missing and criminalised children. We also asked stakeholders to highlight other groups of children that they believed were also marginalised by society to help us understand the wider context within which children go missing and/or are criminally exploited.⁹

7. During this inquiry we have spoken to frontline practitioners and young people via a series of engagement activities, including a range of visits, and held

⁵ ['Letter from the Chair of the Children, Young People and Education Committee to the Deputy Minister for Social Services'](#), 19 December 2023

⁶ ['Letter from the Chair of the Children, Young People and Education Committee to the Minister for Climate Change'](#), 10 January 2024

⁷ ['Letter from the Chair of the Children, Young People and Education Committee to the Temporary Chair of the Health and Social Care Committee'](#), 18 July 2024

⁸ ['Written evidence, CEC8 National Youth Advocacy Service \(NYAS\) Cymru; Written evidence, CEC43 The Children's Society'](#)

⁹ For full terms of reference, see: Welsh Parliament, ['Children on the margins'](#)

stakeholder events with a range of stakeholders. The Senedd's Citizen Engagement Team also held interviews with young people and parents with lived experience of child criminal exploitation.¹⁰ This engagement evidence - alongside the written evidence we received in response to our call for evidence, written responses to targeted correspondence, and additional information requested by the Committee¹¹ - forms the primary evidence base for this report.

8. We are grateful to everybody who has contributed to this inquiry, particularly to the young people we had the pleasure of meeting and whose experiences have shaped our recommendations. In particular, we would like to thank those organisations who committed critical staff time and expertise to hosting engagement visits and responding to our requests for additional information.

Please be advised that this report includes discussions of criminal exploitation and contains content that some readers may find upsetting.

If you think a child is being harmed, or is in immediate danger of being harmed, dial 999, contact your local authority social care department, or contact the NSPCC (by calling 0808 800 5000 or emailing help@NSPCC.org.uk).

Some terms we use in this report

'Child' or 'children': When we refer to a "child" or "children" throughout this report we mean any person who is younger than 18. When we refer to "young people" we mean anybody aged 18-25. We have decided to use these definitions to emphasise that anybody under the age of 18 is a child. This is a critically important distinction, because it shapes the statutory and child protection response to missing episodes and criminal behaviour, as explored below.

'Neurodivergent': In this report, we use the term 'neurodivergent' to refer to people whose brains process information differently to what society considers to be 'neurotypical'. For the purposes of this report, that includes people who are dyslexic, autistic, have ADHD, and so on.

'Learning disability': When we talk about 'learning disabilities' in this report we are referring to people with a reduced intellectual ability and difficulty with

¹⁰ Citizen Engagement Team, '[Children and young people on the margins: Engagement findings](#)', October 2024

¹¹ For all the evidence we have received relating to this inquiry, including a link to the consultation page, visit Welsh Parliament, '[Children on the margins](#)'

everyday activities, which affects someone for their whole life. This includes people with Down's syndrome and some people with autism.¹²

9. If you are not comfortable with any of the terminology in this report please contact us - we always welcome feedback to improve the accessibility of the language we use.

¹² Mencap, ['What is a learning disability?'](#)

2. Groups of children on the margins

Going missing, being involved in criminal activity, and the other dangers we explore in this chapter are both symptoms and causes of marginalisation. A child who goes missing is at heightened risk of criminal exploitation, and vice versa. We consider these dangers separately in this chapter for the purposes of considering their nature and scale, their legislative and policy context, and the child protection response of statutory and non-statutory agencies.

Children who go missing

Defining 'going missing'

10. The Wales Safeguarding Procedures draws on the Authorised Professional Practice (the official source of professional practice for policing) definition of a missing person:

"Anyone whose whereabouts cannot be established will be considered as missing until located and their wellbeing or otherwise confirmed."¹³

11. We heard consistent evidence from a range of stakeholders and academics that, despite a consistent definition and significant guidance from a range of sources, in practice there is no consistent understanding of what it means to be missing.¹⁴ Researchers from the University of Liverpool and Liverpool John Moores University reported feedback from police officers about the challenges of the existing definition of a missing person:

¹³ College of Policing, '[Missing persons](#)', last updated 22 December 2023

¹⁴ [Written evidence, CYPM13 CASCADE, Cardiff University](#); Children, Young People and Education Committee, [20 March 2024, Record of Proceedings](#), paragraphs 46-49

“When asked to define what the term ‘missing’ meant, all participants provided a similar definition that corresponded with the UK CoP (2021) definition, that missing refers to ‘anyone whose whereabouts cannot be established’. Nevertheless, feedback from police officers interviewed highlighted that, in practice, ‘whereabouts unknown’ was insufficient for classifying a person as missing. Police believed that ‘out of character’ was an important factor, despite this no longer being part of the national policing definition.”¹⁵

12. Action for Children told us that reporting thresholds can vary across agencies,¹⁶ and Barnardo’s Cymru raised concern about under-reporting of missing episodes of some groups of children, who are more likely than others to slip through the cracks.¹⁷

13. Children missing from care appear to be subject to particularly variable reporting procedures. Care Inspectorate Wales told us that pressure on social workers “can lead to some very risk-averse behaviour” in terms of when to report a child in care missing.¹⁸ Voices from Care Cymru agreed, arguing that residential care staff – and foster carers to a lesser extent – can report a child missing when they are just “‘being teenagers’ – hanging about with friends in the park, going back to a friend’s house and forgetting to tell their carers”. They report that young people in care would often prefer that their carers try to find them informally first, because the police collecting them from a friend’s house can be a “stigmatising and upsetting” experience.¹⁹

14. St Giles Trust told us that, unlike children missing from care, there are often significant delays before children who are not in care are reported missing.²⁰ Some other professionals agreed, observing that some families are reluctant to report their child as missing because they are afraid that the child will be taken into care.²¹

¹⁵ [Written evidence, CYPM22 Paige Monaghan, Dr Sara Waring, Dr Susan Giles \(University of Liverpool\), and Dr Freya O'Brien \(Liverpool John Moores University\)](#)

¹⁶ [Written evidence, CYPM25B Action for Children](#)

¹⁷ [Written evidence, CYPM21 Barnardo’s Cymru](#)

¹⁸ Children, Young People and Education Committee, [20 March 2024, Record of Proceedings](#), paragraphs 46-49

¹⁹ [Written evidence, CYPM14 Voices from Care Cymru](#)

²⁰ [Written evidence, CYPM19 St Giles Trust](#)

²¹ Children, Young People and Education Committee, [‘Findings of stakeholder events’](#), September 2024, pages 5 & 15

15. The British Psychological Society outlined how the different approaches to reporting missing episodes contribute to a lack of consistency in the support offered to young people:

“The classification of “missing” covers a broad range of circumstances, where a child may go missing for a few hours but return at night, go missing for several days only to eventually return, or a child who goes missing on a regular basis. Many of these children and young people may not be captured in our support system if they return quickly or if there are differing perceptions about when or why someone might be considered missing.”²²

Scale and data

16. The UK Missing Persons Unit (UKMPU) collects and publishes data on all missing children. This data is broken down in various ways, including age and gender. It also includes additional information about mental health concerns amongst children who go missing, and harm suffered during missing episodes. This data is incomplete for Welsh police forces.²³ Nevertheless, the Welsh Government states that the UKMPU data “is considered to be the most consistent data available as it uses the police definition²⁴ of what constitutes a ‘missing’ episode”. It reports that in 2021-22 Wales recorded 10,204 incidents, 3,249 of which relate to individual children and young people. 1,138 of these children and young people were in care at the time of being reported missing.²⁵

17. The Welsh Government also collects and publishes data on children missing from care, broken down by local authority. These statistics are currently listed as “experimental”.²⁶ This data states that 1,422 children have gone missing from care at least once during 2021-22, rising to 2,097 in 2022-23. The Welsh Government told us that published data collected from local authorities relating to the 2023-24 financial year onwards will refer to the number of children receiving “care and support” who go missing. This is a broader definition than children who go missing from care only. Welsh local authorities can also view their data collection

²² [Written evidence, CYPM29 British Psychological Society \(BPS\)](#)

²³ For example, see ‘Missing from care’ data for Welsh police forces: UK Missing Persons Unit, [‘UKMPU Statistical Report 2021-2022’](#), page 38 and UK Missing Persons Unit, [‘UKMPU Statistical Report 2022-2023’](#), page 27

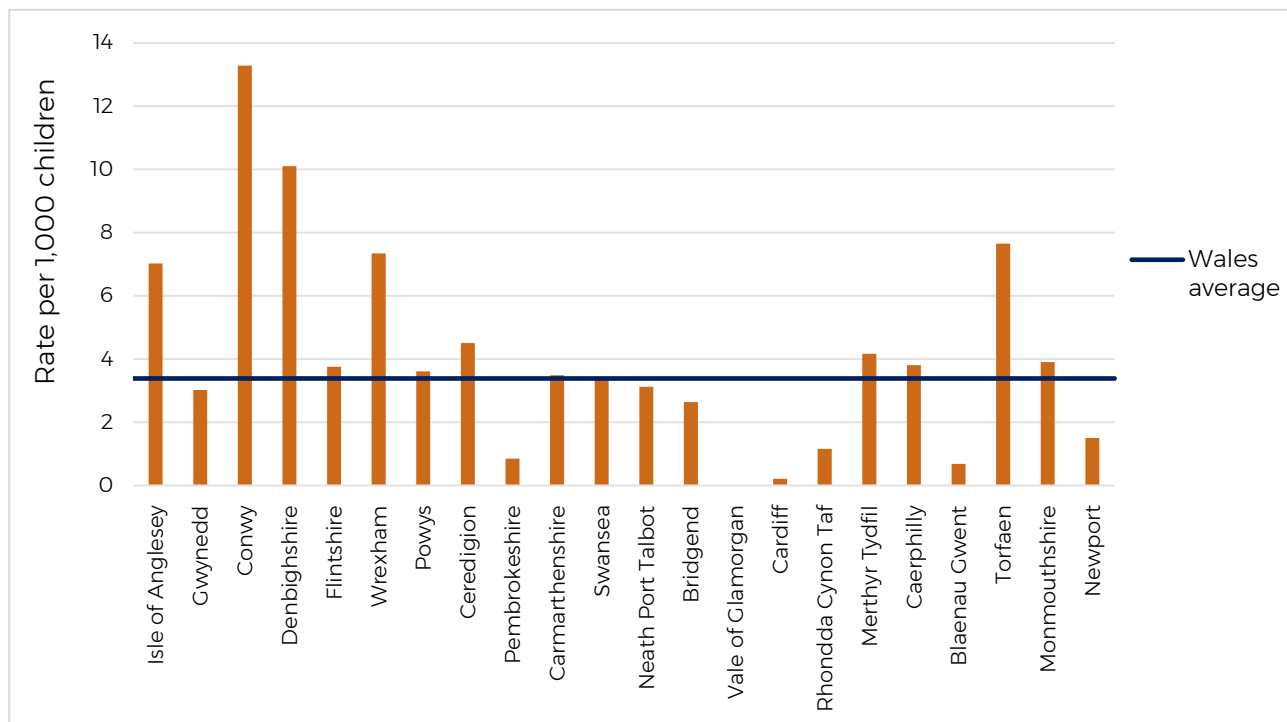
²⁴ National Crime Agency, [‘UK Missing Persons Unit: Missing Persons Data Report 2021/22’](#)

²⁵ Welsh Government, [‘Children and Young People on the margins: Evidence to the Children, Young People and Education Committee’](#), September 2024, pages 4-5 and 7

²⁶ StatsWales, [‘Children who go missing from care during the year, by local authority’](#)

more frequently than the UKMPU data would be available, supporting “prompted responses in strategy and practice”.²⁷

Figure 1: The rate per 1,000 of children who go missing from care during the year 2022-2023 per local authority.²⁸



18. Some other agencies have published data about missing children. Using data obtained from Welsh police forces, NYAS Cymru and The Children’s Society note that every police area in Wales has seen a decrease in the number of children going missing in their geographical area between 2016 and 2021, with Gwent seeing the largest decrease (46%) over the five year period. However:

“... the average child that goes missing in Gwent does so over ten times, a rate which has doubled since 2016 when children went missing an average of 4.7 times. This has happened because the number of missing incidents has increased, while the number of individual children being reported missing each year has almost halved.”²⁹

²⁷ Welsh Government, ‘[Children and Young People on the margins: Evidence to the Children, Young People and Education Committee](#)’, September 2024, pages 4-5 and 7

²⁸ StatsWales, ‘[Children who go missing from care during the year by local authority](#)’. This data is set against: Office of National Statistics, ‘[Estimates of the population for the UK, England, Wales, Scotland and Northern Ireland](#)’, 8 October 2024

²⁹ NYAS Cymru & The Children’s Society, ‘[Missing the Point](#)’, November 2020, pages 9-10

This is consistent with oral evidence we received from Care Inspectorate Wales.³⁰

19. Stakeholders agreed that there is no one reliable source to identify the number of missing children in Wales.³¹ We heard that the inconsistent reporting of missing episodes, as explored above, combined with discrepancies in reporting across local authorities and police forces, mean that we should tread carefully when interpreting published data.³² It was repeatedly suggested to us that although they make up a significant proportion of children who go missing, children in care are over-represented in available data. Some professionals argued that, consequently, policy makers should not focus all of their attention on children in care, because the pool of children going missing is much wider and the reasons for the missing episode can therefore be more diverse.³³

20. We heard a range of views about the profile of children who go missing during our discussions with professionals. Some observed that the age of children going missing is getting younger. One professional suggested that children aged 12-14 were most at risk. Others indicated that they are seeing more girls going missing than before.³⁴

21. Stakeholders regularly advocated a consistent, national approach to data collection to understand better the nature and scale of missing episodes across Wales and ensure we have the right policy response in place.³⁵

22. We asked the Minister for Children and Social Care whether she thought data collection about missing children in Wales was robust enough, considering that data isn't published in Wales about children who go missing who are not in care. She agreed that data is the "basis that can inform how we deal with policy, particularly around safeguarding". She explained that data is collected by a range of organisations including the Welsh Government, local authorities, Care Inspectorate Wales, police and the Home Office. She explained that this data

³⁰ Children, Young People and Education Committee, [20 March 2024, Record of Proceedings](#), paragraph 53

³¹ Children, Young People and Education Committee, ['Findings of stakeholder events'](#), September 2024, page 4

³² [Written evidence, CYPM27, Welsh Women's Aid](#); Children, Young People and Education Committee, ['Findings of stakeholder events'](#), September 2024, page 4; Children, Young People and Education Committee, ['Findings of engagement activities'](#), September 2024, page 3

³³ Children, Young People and Education Committee, ['Findings of stakeholder events'](#), September 2024, page 4

³⁴ Children, Young People and Education Committee, ['Findings of stakeholder events'](#), September 2024, page 3

³⁵ Children, Young People and Education Committee, ['Findings of stakeholder events'](#), September 2024, page 4

informs practice, both in relation to children who are reported missing and children who are being exploited.³⁶

23. However, the Welsh Government's Deputy Director of Social Services Improvement acknowledged to us that "data needs further maturing", and that the Welsh Government has steering groups to look at how to expand local authorities' data reporting so that it feeds into Welsh Government statistics about *all* children who go missing.³⁷

24. We also raised concern with the Minister about the quality of the data collected and published since 2020-21 as part of the Social Services Performance and Improvement Framework. We noted that this Welsh Government data shows that in 2022-23, only 16 children went missing from care in Cardiff, despite other Welsh Government published statistics showing it having over 1,000 children in care during that same time period. In Conwy, 273 individual children are reported to have gone missing, despite there only being 215 individual children in its care at the time. The Welsh Government's Deputy Director of Social Services Improvement confirmed that there was some inaccuracies in the data, and guidance will be updated to improve data quality.³⁸

Why children go missing

25. Llamau, who carry out debriefing services on behalf of Dyfed Powys Police Service, submitted data about why children run away, drawn from interviews they held with children who went missing between October and December 2023:

- 24% of children who went missing said they did so because they wanted to be with friends.
- 12% of children who went missing said they did so due to not being happy/issues in school.
- 11% of children who went missing said they did so due to arguments at home/pushing boundaries.³⁹

³⁶ Children, Young People and Education Committee, [19 September 2024, Record of Proceedings](#), paragraphs 11-16

³⁷ Children, Young People and Education Committee, [19 September 2024, Record of Proceedings](#), paragraphs 11-21

³⁸ Children, Young People and Education Committee, [19 September 2024, Record of Proceedings](#), paragraphs 20-22

³⁹ [Written evidence, CYPM16 Llamau](#)

26. In 2019, NYAS Cymru analysed its own return interview contracts with local authorities across England and Wales, and came to similar conclusions. For children in care placements, they found, the most common ‘push’ factor appears to be ‘breakdown in communication’, while the most common ‘pull’ factor is ‘friendship groups’.⁴⁰ The Children’s Society, meanwhile, argued that children might go missing because of experiences that push them away from their home or placement, such as domestic abuse or placement breakdown.⁴¹

27. The Welsh Government set out that the reasons children are reported missing include:

- reacting to an event or change in their lives such as a change in family circumstances or a bereavement;
- problems at home;
- feeling unhappy about decisions/may not feel listened to;
- to go missing to areas where they have family or connections;
- may be experiencing neglect or abuse at home; and
- encouraged or coerced to go missing by dangerous adults or by other children.⁴²

During oral scrutiny, the Minister for Children and Social Care added that:

“... one of the things that we do know is that many children that are reported as missing are often children that are trying to get back home; they’re trying to get back to the place and the people that they know.”⁴³

The dangers of going missing

28. In a joint report, NYAS Cymru and The Children’s Society argue that:

“When children go missing, we must see that as an indication that something is going wrong in their life. When they go

⁴⁰ NYAS, [‘Inquiry into ‘out of area’ care placements for looked after children and young people’](#), April 2019, page 8

⁴¹ [Written evidence, CYPM18 The Children’s Society](#)

⁴² Welsh Government, [‘Children and Young People on the margins: Evidence to the Children, Young People and Education Committee’](#), September 2024, page 9

⁴³ Children, Young People and Education Committee, [19 September 2024, Record of Proceedings](#), paragraph 12

missing repeatedly, we must see that as a signal that the problem has still not been addressed.”⁴⁴

CASCADE shared similar views, arguing that missing episodes are “the biggest clue of all” for exploitation, and “can be a warning sign to professionals that a child is being used or socially isolated, an attempt to hide the child from professional oversight or the child’s attempt to escape from the people exploiting them”.⁴⁵

29. Other stakeholders consistently agreed that going missing in and of itself places the child at risk of further exploitation or harm, including criminal and/or sexual exploitation.⁴⁶ The Welsh Local Government Association wrote that:

“We know that children with multiple missing episodes and those who go missing for prolonged periods are at high risk of child sexual exploitation and/or criminal exploitation and may be trafficked while they are missing.”⁴⁷

30. The Children’s Society noted that going missing may also be a sign that the child is *already* being exploited.⁴⁸ Others shared similar evidence: Action for Children found from data collected it between November 2023 and March 2024 that 63% of its serious organised crime early intervention services cohort in Flintshire has experienced recorded missing episodes.⁴⁹ CASCADE, meanwhile, shared findings of a study of children affected by child criminal exploitation between 2020 to 2023, which found 71% of the 44 affected by criminal exploitation had at least one missing episode recorded.⁵⁰ And both Voices from Care Cymru and Cymorth Cymru pointed us to Llamau’s analysis of its own debriefing services in 2020, which found that children in 25% of all de-briefs indicated signs of possible child sexual exploitation, with others displaying significant risks of criminal behaviour.⁵¹

Responding to missing incidents

⁴⁴ NYAS Cymru & The Children’s Society, ‘[Missing the Point](#)’, November 2020, page 7

⁴⁵ [Written evidence, CYPM13 CASCADE, Cardiff University](#)

⁴⁶ [Written evidence, CYPM27 Welsh Women’s Aid](#); [Written evidence, CYPM19 St Giles Trust: Children, Young People and Education Committee, ‘Findings of stakeholder events’](#), September 2024, page 14; Children, Young People and Education Committee, [‘Findings of engagement activities’](#), September 2024, page 3

⁴⁷ [Written evidence, CYPM26 Welsh Local Government Association](#)

⁴⁸ [Written evidence, CYPM18 The Children’s Society](#)

⁴⁹ [Written evidence, CYPM25B Action for Children](#)

⁵⁰ [Written evidence, CYPM13 CASCADE, Cardiff University](#)

⁵¹ [Written evidence, CYPM31 Cymorth Cymru](#); [Written evidence, CYPM14 Voices from Care Cymru](#)

The legislative and policy framework

31. Local authorities have statutory duties to investigate and take steps to safeguard children who are suffering or likely to suffer harm.⁵² Regulation 60 and Schedule 3 of the Regulated Services (Service Providers and Responsible Individuals) (Wales) Regulations 2017 require providers of residential care home services for children to notify Care Inspectorate Wales, the placing authority and their own local authority when a child goes missing or has an unexplained absence.⁵³ Other bodies also have duties to inform the relevant local authority if they believe that a child is at risk.⁵⁴

32. However, the primary framework for responding to children who go missing is set out in All Wales Practice Guidance, which was last updated in 2021. In summary, the steps that should be followed once a child is reported missing are as follows:

- Make reasonable efforts to establish the whereabouts of the child before contacting the police.
- If all reasonable efforts to make contact with the child or to locate them are unsuccessful then the child should be reported as missing to the police. Other people who should be notified include anyone with parental responsibility for the child, the child's social worker, and the child's residential care home.
- The police will carry out a risk assessment to determine an appropriate response to the report of the missing child. Meanwhile, while the child is missing, all relevant agencies should liaise with one another to help find the child.
- When a looked after child has been found, the police will carry out a 'Safe and Well Check' to make sure the child is OK. This is not the same as a 'Return Home Interview'.
- The relevant social services should return the child to their home, or take the appropriate steps in line with safeguarding procedures.

⁵² Legislation.gov.uk, '[Children Act 1989](#)', section 47

⁵³ Welsh Government, '[Children and Young People on the margins: Evidence to the Children, Young People and Education Committee](#)', September 2024, page 5

⁵⁴ Legislation.gov.uk, '[Social Services and Well-being \(Wales\) Act 2014](#)', section 130

- When they are ready, the child should be given the opportunity to talk about their experience of going missing. This is called a Return Home Interview. These interviews are sometimes carried out by third sector organisations in partnership with the police.

The guidance also states that social services should refer to All Wales Practice Guides issued with the Wales Safeguarding Procedures on any relevant related issues such as Child Sexual Exploitation (CSE), Child Trafficking, or Child Criminal Exploitation (CCE).⁵⁵

33. We heard mixed views on how effectively statutory agencies respond to missing episodes. Some felt that multi-agency reactive practice is relatively slick and works well. For example, one stakeholder told us that following a missing episode, there are usually regular multi-agency meetings about the child.

34. Others, however, felt that not all statutory bodies discharge their duties to inform the local authority effectively, which can hamper the adequacy of the multi-agency response to specific incidents. One stakeholder told us that residential care homes reports that different local authorities respond differently to missing episodes. They added that, depending on the local authority, children's residential care staff are not consistently involved in important meetings about at risk children at their home. They felt that this was difficult to understand given they are the child's primary care givers.⁵⁶

35. Some stakeholders told us that they struggle to monitor children who go missing.⁵⁷ Generally, there was agreement that it is not appropriate to place a child on the Child Protection Register if they have had a number of missing episodes unless they have faced a significant risk of harm during the missing episode itself. However, we heard that there are no other systems in place to keep track of children who regularly go missing. One stakeholder told us that South Wales Police has developed its own register of high risk missing persons, which it uses to target visits with at-risk people, which can prevent further harm.⁵⁸

36. In its evidence paper, the Welsh Government sets out that it has commissioned research to assist in future policy work relating to children and

⁵⁵ Wales Safeguarding Procedures, '[All Wales Practice Guide: Safeguarding children who go missing from home or care](#)', last updated February 2021

⁵⁶ Children, Young People and Education Committee, '[Findings of stakeholder events](#)', September 2024, pages 4-5

⁵⁷ Children, Young People and Education Committee, '[Findings of engagement activities](#)', September 2024, page 4

⁵⁸ Children, Young People and Education Committee, '[Findings of stakeholder events](#)', September 2024, pages 4-5

young people who are reported missing. That research has led to the formation of an internal policy advisory group and a stakeholder group to consider how we explore the issues raised in the research more widely with all key stakeholders. The inaugural meeting was expected to be held before the end of September. The group will consider return interviews (discussed further below) and assist in the review and revision of the All Wales Practice Guidance.⁵⁹

The National Practice Framework

37. The Welsh Government has committed to developing and publishing a new National Practice Framework, which would contain standards for the response to missing children.⁶⁰ The Welsh Government has stated that “The Framework will be the first set of national standards for children’s services in Wales, sitting alongside the All-Wales safeguarding procedures”.⁶¹ The draft framework is currently under consultation, and has not been published.

38. However, during our engagement activities some stakeholders told us that development of the framework seems to have paused. They said that it is unclear what stage that work had reached and what the next steps are.⁶² Action for Children wrote that:

“While the National Practice Framework Missing Standard is a positive step, there is room for improvement. A more child-focused and welfare-based approach would enhance its effectiveness.”⁶³

39. The Welsh Government told us that work is “firmly underway” to develop and deliver the practice framework. The purpose of the framework, they added, is to deliver “greater commonality and more seamless working at local, regional and national level, and provide families with the support they need as we transition to fitting services around people, not people around services.”⁶⁴ However, the Welsh Government’s Deputy Director of Social Services Enabling explained that local

⁵⁹ Welsh Government, ‘[Children and Young People on the margins: Evidence to the Children, Young People and Education Committee](#)’, September 2024, page 15

⁶⁰ Welsh Government, ‘[Transformation of children’s services programme](#)’, 1 December 2023

⁶¹ Welsh Government, ‘[Transformation of Children’s Services Programme – Communication Update](#)’, September 2023

⁶² Children, Young People and Education Committee, ‘[Findings of engagement activities](#)’, September 2024, page 4

⁶³ [Written evidence, CYPM25B Action for Children](#)

⁶⁴ Welsh Government, ‘[Children and Young People on the margins: Evidence to the Children, Young People and Education Committee](#)’, September 2024, page 11

authorities had fed back that the original plan – to create 26 additional standards – could create confusion. Consequently, the Welsh Government has:

“... refocused that now into five standards that are very much looking at that multi-agency working: infrastructure, strategy, learning, governance and delivery. We’ve redrafted now that framework. It’s about to go out for further engagement and we will be underpinning that framework with a number of practice notes, and missing children will be within that first tranche that will be delivered by March next year. So, the plan is that we go back out, we’ve got feedback already that it’s in much better shape. We will then publish that by the end of the year, then we will have the practice notes, and there will be a wide range of those.”

He added that the new standards will be “short, sharp and focused on practitioners”, and would be accompanied with training and development to embed the practice frameworks across local authorities.⁶⁵

‘Return Interviews’

40. We received a significant amount of evidence about return interviews (referred to as ‘Return Home Interviews’ in the All Wales Practice Guidance, as noted above). The organisations attending our stakeholder events agreed that return interviews are an essential safeguarding tool.⁶⁶ CASCADE told us that interviews revealed vital information for safeguarding and for targeting those higher up the exploitation chain.⁶⁷ Voices from Care Cymru told us that insights gained through return interviews are “invaluable in understanding the complexities of missing children cases and tailoring interventions to meet the specific needs of each individual.”⁶⁸ The Children’s Society wrote that return interviews can help to identify “push and pull” factors, to determine where they were, with whom, and to understand the reasons why they went missing. This information can be used to provide immediate support to the young person and to prevent future missing episodes.⁶⁹ NYAS Cymru and The Children Society also

⁶⁵ Children, Young People and Education Committee, [19 September 2024. Record of Proceedings](#), paragraphs 34-39

⁶⁶ Children, Young People and Education Committee, [‘Findings of stakeholder events’](#), September 2024, page 5

⁶⁷ [Written evidence. CYPM13. CASCADE. Cardiff University](#)

⁶⁸ [Written evidence. CYPM14. Voices from Care Cymru](#)

⁶⁹ [Written evidence. CYPM18. The Children’s Society](#)

highlighted that return interviews can give asylum-seeking children the opportunity to report exploitation or trafficking at the earlier opportunity.⁷⁰

41. However, we also heard that return interviews are carried out inconsistently across Wales, and in some cases not carried out at all.⁷¹ Voices from Care Cymru, The Children’s Society and Welsh Women’s Aid all agreed that interview practice is not consistent, and that young people’s experiences vary depending on where they live.⁷² For NYAS Cymru, the inequality of access to return interview services and provision for children and young people is partially due to inconsistent commissioning arrangements. They called for an all-Wales service specification within a commissioning framework.⁷³ They, alongside The Children’s Society, explained that funding for return interviews is not consistent, either. They can be funded by the local police force, local authorities, or even from grants or other income sources.⁷⁴

42. For The Children’s Society, the All Wales Practice Guidance is insufficient to ensure a consistent and robust approach to return interviews across Wales:

“Here [are] key questions for which current the [sic] practice guide offers no advice: Who should conduct the return home interview? Does the interviewee need to be independent of the child’s care? How quickly should a return home interview take place? Where should the return home interview happen? What is discussed in a return home interview and what happens next? What happens if a child refuses to take part in a return home interview? Who is responsible for a return home interview if a child lives ‘out of area’? How is information from return home interviews to be collated and analysed?”⁷⁵

43. Since 2014, offering an independent return interview to all young people who have been reported as missing has been a statutory duty in England. We heard numerous calls for return interviews to be put on a statutory footing in Wales, too, to address inconsistencies in practice.⁷⁶ Barnardo’s Cymru gave their support for

⁷⁰ NYAS Cymru & The Children’s Society, ‘[Missing the Point](#)’, November 2020, page 15

⁷¹ Children, Young People and Education Committee, ‘[Findings of stakeholder events](#)’, September 2024, page 5; Children, Young People and Education Committee, ‘[Findings of engagement activities](#)’, September 2024, page 4

⁷² [Written evidence, CYPM14 Voices from Care Cymru](#)

⁷³ [Written evidence, CYPM28 National Youth Advocacy Service Wales \(NYAS Cymru\)](#)

⁷⁴ NYAS Cymru & The Children’s Society, ‘[Missing the Point](#)’, November 2020, page 8

⁷⁵ [Written evidence, CYPM18 The Children’s Society](#)

⁷⁶ [Written evidence, CYPM28 National Youth Advocacy Service Wales \(NYAS Cymru\)](#); NYAS Cymru & The Children’s Society, ‘[Missing the Point](#)’, November 2020, page 15; [Written evidence, CYPM27](#)

making return interviews statutory, but only as a way of improving consistency, practice, and funding:

“The priority for Return Home Interviews is for investment, training and support for staff, and for an embedded approach that is trauma-informed, relationship-based, child-centered [sic] and, importantly, independent. If the means to achieving this is by creating a statutory requirement, then we would support this.”⁷⁷

44. Stakeholders generally agreed that children and young people should be able to determine whether they take up the offer of a return interview, how it’s carried out, and who it’s held with.⁷⁸ Voices from Care Cymru reported very mixed views about return interviews from its service users, concluding that the interviews should be optional.⁷⁹ NYAS Cymru agreed. However, they added that although the first offer of an interview should be made within 72 hours of the missing incident, if the young person declines, another offer should be made within 1-2 weeks.⁸⁰

45. NYAS Cymru, Voices from Care Cymru and others argued that young people should be able to choose who carries out the return interview, and, critically, that the interviewer should be independent from statutory services, if the young person prefers.⁸¹

46. Some stakeholders stressed that it is crucial that the relevant agencies act on what children disclose during return interviews.⁸² Voices from Care Cymru quoted one young person, who told them:

“What was the point of me doing interview after interview saying that I’m not happy there and I didn’t want to stay when no one took any notice and nothing changed. I just kept doing what I could do - running away from there.”

Welsh Women’s Aid: Children, Young People and Education Committee, ‘Findings of stakeholder events’, September 2024, pages 5-6

⁷⁷ Written evidence, CYPM21 Barnardo’s Cymru

⁷⁸ Children, Young People and Education Committee, ‘Findings of engagement activities’, September 2024, page 4

⁷⁹ Written evidence, CYPM14 Voices from Care Cymru

⁸⁰ Written evidence, CYPM28 National Youth Advocacy Service Wales (NYAS Cymru)

⁸¹ Written evidence, CYPM14 Voices from Care Cymru; Written evidence, CYPM18 The Children’s Society; Written evidence, CYPM21 Barnardo’s Cymru; Written evidence, CYPM4 Education Otherwise

⁸² Children, Young People and Education Committee, ‘Findings of stakeholder events’, September 2024, page 6

They asserted that we need to listen to children who go missing, and take action accordingly.⁸³ NYAS Cymru argued in favour of a central reporting system for return interviews, to allow the information collected during the interviews to be shared amongst professionals. They suggested that it should be a statutory requirement that submissions to the reporting system are made within 72 hours of the interview being carried out.⁸⁴

47. However, despite the consistency of the evidence that we received about return interviews, the Minister for Children and Social Care told us that research commissioned by the Welsh Government did not find a consensus about whether return-to-home interviews should be mandatory and who should conduct them. We note that this research has not been placed in the public domain and pushed the Minister for clarity on this point, stressing the evidence we have received advocated a mandatory *offer*, not a mandatory interview. The Minister reaffirmed Welsh Government's view that a mandatory offer is not consistent with what children and young people themselves are calling for.⁸⁵

Our view

An indicator of distress, and both a risk factor and a symptom of marginalisation

48. For many children, going missing is a distress signal. A way to communicate to the people around them that something is going wrong. Some children, particularly those in care, may feel that they have no choice but to vote with their feet. They may feel like they are not being listened to, or what they're saying isn't being acted upon. In that context, going missing is an early warning to agencies that a vulnerable child needs support.

49. We also note that going missing is a risk factor in and of itself. We were concerned to hear about the findings of research from Llamau indicating that a high proportion of the children they interview following a missing episode show signs of sexual or criminal exploitation. Many children also go missing as a consequence of their involvement in criminal activities, which we explore later in this report.

50. We are reassured by the strength of the responses we received from both statutory and non-statutory agencies to our calls for evidence. They demonstrate a

⁸³ [Written evidence, CYPM14, Voices from Care Cymru](#)

⁸⁴ [Written evidence, CYPM28, National Youth Advocacy Service Wales \(NYAS Cymru\)](#)

⁸⁵ Children, Young People and Education Committee, [19 September 2024, Record of Proceedings](#), paragraphs 42-47

strong commitment to working with children to address the underlying causes of missing episodes, and indicate that children who go missing are high on the agenda of those work on the frontline.

51. Unfortunately, we do not believe that the Welsh Government's current approach demonstrates a full understanding of how missing episodes fit into the wider picture of child exploitation and marginalisation. Neither does the Welsh Government appear to demonstrate the sense of urgency in their policy response that these children's circumstances should demand. Welsh Government can, and should, do more.

Data

52. We recognise the value and power of data as a critical tool for policy development. Concerns about data collection are a thread that has run throughout our work over the course of this Senedd. We reiterate here what we have concluded time and time again: without accurate and reliable data collection and publication it is impossible to understand the nature of the challenges we face, let alone work together on how to overcome them.

53. Clearly, something is not working as it should when a local authority is reporting more individual children who go missing from care than the total number of children who are in care at the time. Or if only 16 children are reporting as having gone missing from a local authority that has over 1,000 children in care. It suggests to us that there is no real oversight of what these statistics as published are telling us.

54. We do not believe that any conclusions can be drawn from data that the Welsh Government currently publishes on children missing from care. Worse: it appears the data may not meet even basic quality thresholds. We welcome that the Welsh Government has acknowledged these inaccuracies, and is updating its guidance accordingly. But we believe it should go further.

Recommendation 1. The Welsh Government should work with local authorities and police forces to take robust, immediate action to ensure that the data it publishes relating to children missing from care and missing episodes among children receiving care and support (received from local authorities) are accurate and reliable. The Welsh Government should report back to us within 6 months to provide an update on the issues identified by the partnership and action taken.

55. We understand that care experienced children are particularly vulnerable to going missing. From all of our work on the care system to date we recognise that

this vulnerability has multiple causes: the trauma that many care experienced children have experienced, the lack of a loving family support system, and the all too frequently poor quality and even inappropriate placements that many children are forced to endure. We are saddened, but not surprised, that a significant proportion of missing episodes involve care experienced children.

56. We also share the concerns of stakeholders that many – if not most – children who go missing are not in care. Currently, these children are completely absent from Welsh Government statistics. It’s difficult to see how good policy responses can be developed in the absence of hard facts. We note that data about missing episodes generally is available from the UKMPU. However, UKMPU data is not broken down at the level of detail that we need for policy development here in Wales, and unfortunately much of it is missing for Welsh police forces.

57. Welsh Government’s data drawn from local authorities has large and obvious gaps that will remain even if the data quality issues noted above are remedied. We recognise that there may be challenges working alongside both police forces and local authorities to bring all this data into one place and ensure it is fit for publication. We therefore ask the Welsh Government to consider how it might address these shortcomings and work towards one reliable, exhaustive data release covering all missing episodes in Wales.

Recommendation 2. The Welsh Government should carry out a feasibility study into the development of data release that is as accurate, reliable and as exhaustive as feasibly possible, covering all episodes of children who go missing in Wales. The data should be broken down separately by age, care experience, local authority, primary reason for going missing (if known), and in conjunction with stakeholders, any other factors the Welsh Government considers useful for policy development purposes.

Improving consistency in the response to missing episodes

58. There are crucially important areas of work that will support agencies’ efforts to reduce the scale and impact of missing episodes, such as improving school attendance, avoiding any unofficial school ‘off-rolling’ and alternative fulltime EOTAS provision, providing high quality placements for children in care, early intervention for families in crisis, etc. These issues are explored elsewhere in this report.

59. But in terms of the immediate response to missing episodes, we have heard overwhelming evidence that return interviews are a critical tool for safeguarding

agencies to better understand what has led to the child going missing, what dangers they faced while they were missing, and – crucially – how to reduce the likelihood of them going missing again. We are therefore deeply concerned by the inconsistency with which return interviews are carried out across Wales.

60. The Welsh Government has told us that the delayed National Practice Framework will improve collaboration and consistency at a local, regional and national level by including a standard practice approach to missing children. While we welcome that potential for improvement, we have noted that delays to the framework have not been among the primary concerns of the organisations from whom we have received evidence. We are not convinced that the revised National Practice Framework is the critical change that the sector requires.

61. We did, however, receive overwhelmingly consistent evidence about the need for return interviews to be offered to every child who goes missing, and for the interviews to be carried out more consistently. We heard that the best way to do this would be to make the offer of a return interview mandatory, by law.

62. We were surprised, therefore, when the Minister for Children and Social Services told us that there is no consensus over whether there should be a mandatory offer of a return interview following every missing episode. We recognise that not every child will want a return interview, but if the *offer* is mandatory – not the interview – children will be able to refuse an interview if they want. We have yet to hear any convincing argument as to why offering every child who goes missing a conversation with a trusted adult to find out more about the missing episode will do anything other than improve safeguarding practice.

63. We also support calls for the child to be able to nominate who carries out their interview: a member of the police, a social worker, a foster carer or an independent charity worker. Return interviews must remain child focused. Giving the child the right to choose who they speak to out of a range of trained and trusted adults is essential to ensuring that the child feels able to fully engage in the process.

64. We are wary, however, that having a range of adults carrying out return interviews may make it harder for there to be a consistent approach across Wales. The Welsh Government should therefore accompany a new statutory requirement for a return interview with clear, definitive guidance on how return interviews should be conducted.

Recommendation 3. The Welsh Government should amend legislation to make the offer of a return interview a statutory requirement following each missing episode. The child should have the right to decide who carries out that interview from among a pool of trusted and competent adults, and robust statutory guidance should be issued for practitioners to set out clearly how return interviews should be conducted to ensure consistency across Wales. As part of this guidance, the Welsh Government should create a form for practitioners to use which states whether the offer of a return interview was accepted or rejected, for ease of sharing this data with relevant stakeholders.

Criminally exploited children

The definition of Child Criminal Exploitation (CCE)

65. There is no explicit legal definition of CCE. Instead, the legal framework relating to criminally exploiting children falls under the Modern Slavery Act 2015, the Children and Young Persons Act 1933, the Child Abduction Act 1984 and the Children Act 1989.⁸⁶ The most up-to-date UK Government definition of CCE comes from its 2018 Serious Violence Strategy:

Child Criminal Exploitation occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. Child Criminal Exploitation does not always involve physical contact; it can also occur through the use of technology.⁸⁷

66. Many aspects of the legal frameworks are reserved to the UK Government and UK Parliament. However, there is a non-statutory definition of CCE in Wales, drawn from the All Wales Practice Guide, which supports the Wales Safeguarding Procedures:

⁸⁶ [Written evidence, CYPM27 Welsh Women's Aid](#); [Written evidence, CYPM28 National Youth Advocacy Service Wales \(NYAS Cymru\)](#); [Written evidence, CYPM18 The Children's Society](#);

⁸⁷ HM Government, '[Serious Violence Strategy](#)', April 2018, page 48

“Child Criminal Exploitation (CCE)...**... Is a form of child abuse which involves criminal exploitation and requires a safeguarding response**

Children are involved in criminal activities including the movement of drugs or money which results in personal gain for an individual, group or organised criminal gang

... Involves a child

It occurs to those up to the age of 18 years old.

... Involves enticement and/or force

Involves an element of exchange and can still be exploitation even if the activity appears consensual.

Can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence.

Is typified by some form of power imbalance in favour of those perpetrating the exploitation.”⁸⁸

67. We heard consistently, from a range of different stakeholders, that the lack of a statutory definition of CCE is hampering the efforts of both statutory and non-statutory bodies to protect children from exploitation.⁸⁹ Stakeholders told us that, without a statutory definition:

- There is no consistent understanding of criminal exploitation or the early indicators of grooming across safeguarding agencies. Consequently, there is no cohesive understanding that children who commit offences because of exploitation are victims, rather than perpetrator of crime. This can limit law enforcement agencies’ focus on those who manipulate, deceive, or use coercion and control children into undertaking criminal activity.⁹⁰

⁸⁸ Adapted from: Wales Safeguarding Procedures, ‘[Safeguarding children from Child Criminal Exploitation \(CCE\)](#)’, last updated February 2021

⁸⁹ Children, Young People and Education Committee, ‘[Findings of engagement activities](#)’, September 2024, page 5

⁹⁰ [Written evidence, CYPM28 National Youth Advocacy Service Wales \(NYAS Cymru\)](#)

- Professionals do not place sufficient focus on serious, but less well-known, forms of exploitation (such as children who are exploited by family members or local individuals, or groups in areas of Wales that have retained more traditional modes of drug supply).⁹¹
- There is no solid legal basis for services to intervene, and no clear lead-agency to tackling CCE.⁹²
- There are discrepancies and inconsistencies in the understanding of the impact of criminal exploitation on children, hampering multi-agency working⁹³ and a lack of early intervention to address CCE⁹⁴.
- There are inconsistent methods of recording data related to CCE, making it difficult to gauge its true nature and scale (scale and data are considered in more detail below).⁹⁵

68. When we asked the Cabinet Secretary for Social Justice, Trefnydd and Chief Whip (“the Cabinet Secretary”) for her views on whether there should be a statutory definition of CCE, she referenced the forthcoming UK Government Crime and Policing Bill. She told us that it was “early days” for the Welsh Government to come to a view on a statutory definition, and that she would need to see what is emerging from the draft legislation, and its implications for Wales.⁹⁶

Child Criminal Exploitation (CCE) in practice

69. ‘County lines’ is perhaps the most frequently mentioned, and widely understood, form of CCE. The Jay Review states that:

“County lines is referred to regularly by government strategy and national agencies... with well-networked, well-funded professional groups operating at a national or international level to bring large quantities of drugs into the UK, and a chain

⁹¹ [Written evidence, CYPM13 CASCADE, Cardiff University](#)

⁹² Jay, A. et al, ‘[Shattered lives, stolen futures. The Jay Review of Criminally Exploited Children](#)’, March 2024, page 41; [Written evidence, CYPM13 CASCADE, Cardiff University](#)

⁹³ [Written evidence, CYPM27, Welsh Women’s Aid](#); [Written evidence, CYPM13 CASCADE, Cardiff University](#)

⁹⁴ [Written evidence, CYPM27, Welsh Women’s Aid](#)

⁹⁵ [Written evidence, CYPM25B Action for Children](#)

⁹⁶ Children, Young People and Education Committee, [19 September 2024, Record of Proceedings](#), paragraphs 60-64

of command running down to local areas in which children provide an expendable workforce.”⁹⁷

70. Welsh Women’s Aid’s written evidence to us noted “increasing reports of county lines gangs spreading across the border and exploiting young people in more rural Welsh communities”.⁹⁸ Some professionals reported that children can be trafficked across Wales, and even across borders. One frontline professional told us about one young person who had been electronically tagged as a result of a court order, whose movements agencies were then able to track. They could see that the child was taken out to sea, docked in Liverpool, then was tracked back to north Wales. We heard that children as young as 11 are being targeted, and concerns that some gangs were seen as so successful at recruiting that they are amongst the biggest employers of young people in certain areas.⁹⁹

71. However, not all CCE falls under the definition of ‘county lines’. Stakeholders reported a wide range of criminal activity involving children, taking different forms in different parts of Wales. Voices from Care Cymru and the Welsh Local Government Association (WLGA) agreed that involvement in gangs or organised crime tends to be more pronounced in urban areas with higher levels of social deprivation and gang activity.¹⁰⁰ Action for Children observed that, in Cardiff in particular, there are persistently high levels of violence and gang-related rivalry, with local organised crime groups primarily managing operations – including the exploitation of children – within the area itself, rather than across counties/countries.¹⁰¹ St Giles Trust reported that the prevalence in the wider Newport area is less likely to be attributable to gang activity. The existing local drug distribution networks were perceived to be well-established so different types of child exploitation have developed, including a prevalence of children being exploited by wider family members as part of patterns of inter-generational exploitation. Other professionals at our stakeholder events agreed.¹⁰² Barnardo’s Cymru raised concern about the rise in exploitation which is facilitated online,

⁹⁷ Jay, A. et al, ‘[Shattered lives, stolen futures. The Jay Review of Criminally Exploited Children](#)’, March 2024, page 15

⁹⁸ [Written evidence, CYPM27 Welsh Women’s Aid](#)

⁹⁹ Children, Young People and Education Committee, ‘[Findings of stakeholder events](#)’, September 2024, pages 7-9

¹⁰⁰ [Written evidence, CYPM14 Voices from Care Cymru](#); [Written evidence, CYPM26 Welsh Local Government Association](#)

¹⁰¹ [Written evidence, CYPM25B Action for Children](#)

¹⁰² [Written evidence, CYPM19 St Giles Trust](#); Children, Young People and Education Committee, ‘[Findings of stakeholder events](#)’, September 2024, page 9

creating greater risks for children and young people when if they are physically safe inside the home.¹⁰³

72. We also heard that the exploiters' approaches to child exploitation are as varied as the nature of the criminal activity itself. In general, more sophisticated exploitative techniques will be employed by more professional and well-funded criminal groups, compared to the more "chaotic dynamics" of urban street gangs.¹⁰⁴

73. Voices from Care Cymru told us that perpetrators can exploit children's financial vulnerabilities, lack of employment opportunities, or desire for material possessions to manipulate them into illegal activities.¹⁰⁵ CASCADE explained that exploiters often convince the child that their exploiters are friends, then ensure that parents receive regular messages from the child's phone to allay the parents' fears if the child has gone missing and make them less likely to contact the police.¹⁰⁶ Action for Children documented to us the breadth of criminal activity that children can be involved in:

"The methods of exploitation vary widely, but most children are drawn into activities such as drug dealing and distribution, burglary, violence, disorder offences, and motor offences. Many of these children carry weapons, either because they are instructed to do so by exploiters or for their own safety. During sessions, children often wear stab-proof vests, reflecting their sense of vulnerability within their local communities."¹⁰⁷

74. However, the Jay review explains that despite these extensive variations, once grooming has begun, it tends to follow a typical pattern:

"The process of exploitation unfolds through a series of incremental steps, marked by a mix of incentives, coercion and threats. The Children's Society explains the cycle of exploitation

¹⁰³ [Written evidence, CYPM21 Barnardo's Cymru](#)

¹⁰⁴ Jay, A. et al, '[Shattered lives, stolen futures. The Jay Review of Criminally Exploited Children](#)', March 2024, page 15

¹⁰⁵ [Written evidence, CYPM14 Voices from Care Cymru](#)

¹⁰⁶ [Written evidence, CYPM13 CASCADE, Cardiff University](#)

¹⁰⁷ [Written evidence, CYPM25B Action for Children](#)

through stages of 'target', 'test', 'trap', which provides a useful approach to understand children's experiences."¹⁰⁸

75. As an example of how children are 'trapped', we heard about so-called 'debt bondage', whereby criminalised children fall into financial debt to their exploiters, and are consequently bound to their exploiters and to ongoing criminal activity to pay off their debt. The debt bondage can be created if the child is arrested with drugs that are subsequently seized by the police, or if the child is mugged by members of rival gangs.¹⁰⁹ Some criminal gangs will even deliberately manufacture financial debt to trap the child in debt bondage, for example by orchestrating muggings of the young person while they are in possession of the gang's own drugs or cash.¹¹⁰

76. The British Psychological Society highlighted that once the child loses their usual protective buffers (such as family and friends), they may seek belonging elsewhere and are prone to communities and environments that are unsafe or dangerous.¹¹¹ Other stakeholders agreed, telling us that, for many young boys, their motivation for being lured into gangs is to gain a much needed sense of belonging, rather than money.¹¹²

77. This written evidence was reinforced by the young people with lived experience of criminalisation who spoke to our Citizen Engagement Team. They described a common pattern in which criminal gangs target and manipulate vulnerable young people, gradually pulling them into a life of crime. They emphasised that this recruitment process is not random, and relies on the gang's awareness of the local area and identification of children who appear isolated or unsupervised. The gang members watch these children over time to assess which ones are likely to be receptive to their influence. We were told that gangs often exploit the emotional needs of these young people, presenting themselves as father figures or caring mentors to children who may lack stable family support. This false sense of belonging and care entices many young people into gang life. Once involved, the young people are drawn deeper through small tasks and favours, which quickly escalate into more serious criminal activities. Gradually, a

¹⁰⁸ Jay, A. et al, '[Shattered lives, stolen futures. The Jay Review of Criminally Exploited Children](#)', March 2024, page 27, quoting The Children's Society, '[Counting Lives: Responding to children who are criminally exploited](#)', July 2019, pages 8-9

¹⁰⁹ Children, Young People and Education Committee, '[Findings of stakeholder events](#)', September 2024, page 9

¹¹⁰ Jay, A. et al, '[Shattered lives, stolen futures. The Jay Review of Criminally Exploited Children](#)', March 2024, page 28

¹¹¹ [Written evidence, CYPM29 British Psychological Society \(BPS\)](#)

¹¹² Children, Young People and Education Committee, '[Findings of engagement activities](#)', September 2024, page 5

cycle of debt, obligation, and dependency is created, making it increasingly difficult for the young person to leave.¹¹³

78. Once children are implicated in serious criminal activity, they are often subject to brutal levels of violence, as the Jay Review documents:

“The level of violence described by children and parents in evidence was shocking. We heard examples of children being hit by cars, stabbed, burned with acid, sexually assaulted and beaten. Often their attackers were other children, sometimes those they had previously viewed as friends.”¹¹⁴

79. Action for Children and others stressed that the severe exploitation children can experience subjects them to psychological distress, physical violence, family disruption, and removal from their communities. This trauma has life changing impacts on our children, young people and families.¹¹⁵

Scale and data

80. It is currently impossible to know for certain the true scale of CCE. This is partly because CCE has no statutory definition, as explored above, and partly because there is no official, validated approach to data collection across the UK.¹¹⁶ The Office of National Statistics’ most recent (2022) data release on child victims of modern slavery cautions that “There is no one data source that accurately quantifies the number of child victims in the UK. The National Referral Mechanism (NRM) [a UK-wide framework for identifying and referring potential victims of modern slavery] currently provides the best measure of potential victims, although is known to be an undercount.”¹¹⁷ The NRM data is set out at figure 1. We discuss the NRM itself in more detail below.

¹¹³ Citizen Engagement Team, ‘[Children and young people on the margins: Engagement findings](#)’, October 2024, pages 7-8

¹¹⁴ Jay, A. et al, ‘[Shattered lives, stolen futures. The Jay Review of Criminally Exploited Children](#)’, March 2024, page 33

¹¹⁵ Written evidence, CYP25B Action for Children; Jay, A. et al, ‘[Shattered lives, stolen futures. The Jay Review of Criminally Exploited Children](#)’, March 2024, page 35

¹¹⁶ [Written evidence, CYP28 National Youth Advocacy Service Wales \(NYAS Cymru\)](#); Jay, A. et al, ‘[Shattered lives, stolen futures. The Jay Review of Criminally Exploited Children](#)’, March 2024, page 51

¹¹⁷ Office for National Statistics, ‘[Child victims of modern slavery in the UK: March 2022](#)’, 29 March 2022

Figure 2: Number of total referrals to the NRM, with positive referral grounds decisions of children in bold in brackets, in England, Scotland and Wales by calendar year.¹¹⁸

	2019	2020	2021
England	4,159 (3,648)	4,583 (4,260)	4,979 (4,516)
Scotland	156 (149)	119 (103)	104 (97)
Wales	175 (159)	217 (209)	291 (264)
British Transport Police	47 (40)	82 (76)	53 (53)

81. The Welsh Government explains that residential care home providers and providers of fostering services must notify Care Inspectorate Wales, the placing authority, their own local authority and the police of any incident (or suspected incident) of child sexual exploitation (CSE) or child criminal exploitation (CCE). The paper sets out that there were 89 such notifications in 2022-23, and 82 in 2023-24.¹¹⁹

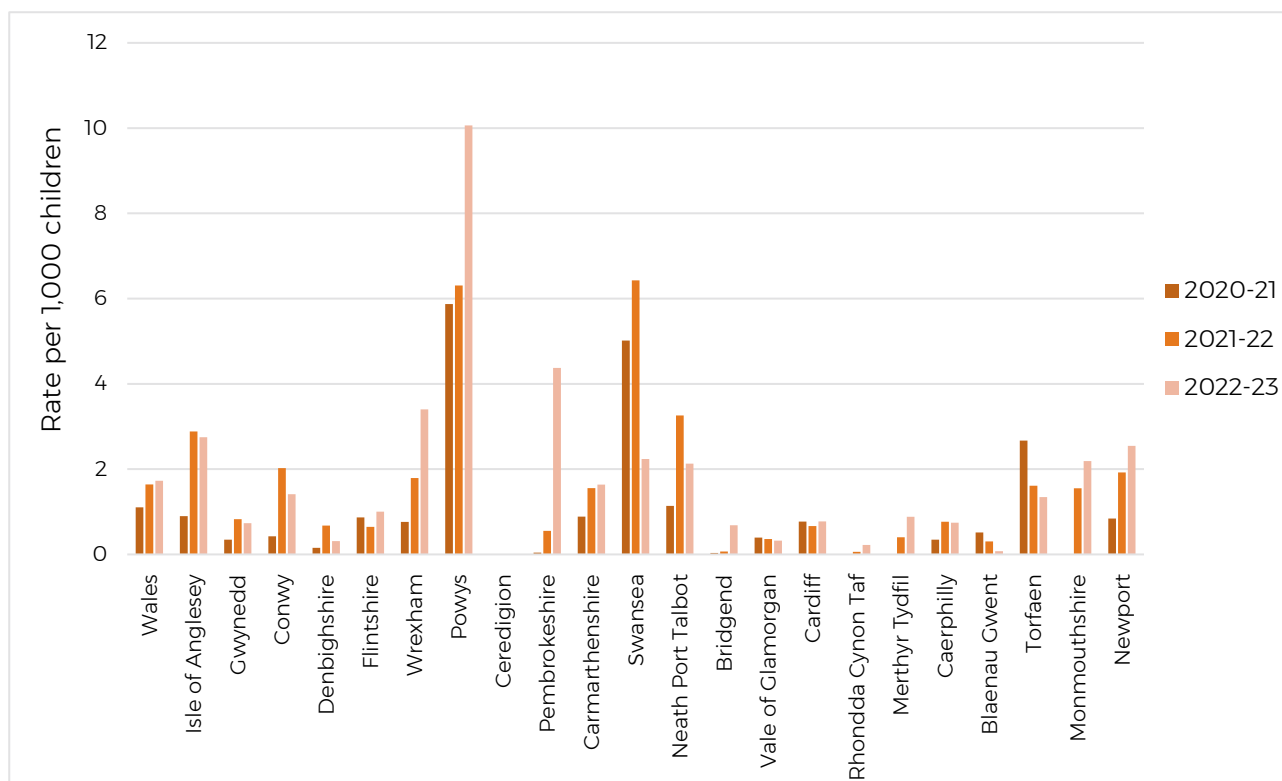
82. The Welsh Government also collects and publishes data about the number of reports of child exploitation raised at child strategy meetings (which take place when there is cause to believe may be at risk or is suffering significant harm). However, the Welsh Government has cautioned that “there are some concerns with the way in which local authorities are recording and reporting this data”, adding that “Further work is ongoing to make sure this data is captured reliably and consistently across all regions.”¹²⁰ Figure 3 below combines this data with child population data to compare the rate of CCE reports per 1,000 children across local authorities.

¹¹⁸ Source: Office for National Statistics, ‘[Child victims of modern slavery in the UK](#)’, 29 March 2022. Northern Ireland has not been included because most of the equivalent data is unavailable. Referrals for the British Transport Police were split out from England from 2019.

¹¹⁹ Welsh Government, ‘[Children and Young People on the margins: Evidence to the Children, Young People and Education Committee](#)’, September 2024, page 6

¹²⁰ [Letter from the Cabinet Secretary for Social Justice, Trefnydd and Chief Whip and the Minister for Children and Social Care to the Chair of the Children, Young People and Education Committee](#), 9 October 2024

Figure 3: The rate per 1,000 children of strategy meetings about a child where ‘child criminal exploitation’ was an exploitation factor (for years 2020-21 and 2021-22)/the primary exploitation factor (for 2022-23).¹²¹ The same child may be associated with multiple reports of child criminal exploitation.



83. Commenting on the scale of CCE, Welsh Women’s Aid suggested that there are “regional disparities in incidence and prevalence across Wales, with this being extremely common in some areas but relatively rare in others.”¹²² The British Psychological Society reported that there were 2,612 arrests of children aged 10 to 17 for notifiable offences (offences which require the police to record an incident as a crime and report the occurrence to the Home Office) in Wales in 2020-21, but caveated that figure by explaining that many young people will have engaged in criminal activity but not have been charged.¹²³ Barnardo’s Cymru tried to gather

¹²¹ StatsWales, ‘[Number of children reported during the year where child exploitation was a factor, by local authority](#)’, last updated 9 April 2024. Note that multiple strategy meetings could have been held about the same child over the course of one year. For 2020-21 and 2021-22, any child exploitation factors raised about a child at the same strategy meeting were included in the data (e.g., if child criminal exploitation and child sexual exploitation were recorded about the same child during the same strategy meeting, both factors would have been recorded). However, for 2022-23, only the primary exploitation factor was included (e.g. if both child criminal exploitation and child sexual exploitation were recorded about the same child during the same strategy meeting, either child criminal exploitation or child sexual exploitation would have been recorded, depending on which was the primary factor). This data is set against: Office of National Statistics, ‘[Estimates of the population for the UK, England, Wales, Scotland, and Northern Ireland](#)’, 8 October 2024

¹²² [Written evidence, CYPM27, Welsh Women’s Aid](#)

¹²³ [Written evidence, CYPM29, British Psychological Society \(BPS\)](#)

data about the scale of CCE in 2021 via a Freedom of Information request to police forces, but only one police force was able to provide any.¹²⁴

84. The evidence we received indicates that the lack of reliable data is hampering efforts to respond to CCE in Wales.¹²⁵ Welsh Women’s Aid told us that CCE is a “largely hidden form of abuse meaning it is hard to get an accurate picture of its prevalence”.¹²⁶ The Jay Review stated that:

“... a lack of local and national data, information sharing and systemic learning is hindering the ability of practitioners, agencies and government to understand the scale and extent of the criminal exploitation of children, patterns of criminal activity, priority areas of focus and whether progress is being made.”¹²⁷

To address the lack of data, stakeholders including NYAS Cymru recommend that the Welsh Government improve data transparency, by independently collecting and annually pushing data on CCE, including data on Welsh referrals to the National Referral Mechanism.¹²⁸

85. During oral scrutiny, the Cabinet Secretary told us that “we have to be very concerned, as this committee is, about the fact that child criminal exploitation is a frequently identified form of exploitation in Wales.” She added that 59% of referrals between April and June of 2024 were for children, and that 49% of referrals were for criminal exploitation.¹²⁹ She subsequently provided more detail to the Committee by correspondence: see figure 4 below.

¹²⁴ Barnardo’s, ‘[Child Exploitation: A Hidden Crisis](#)’, June 2023, page 4

¹²⁵ Children, Young People and Education Committee, ‘[Findings of engagement activities](#)’, September 2024, page 5

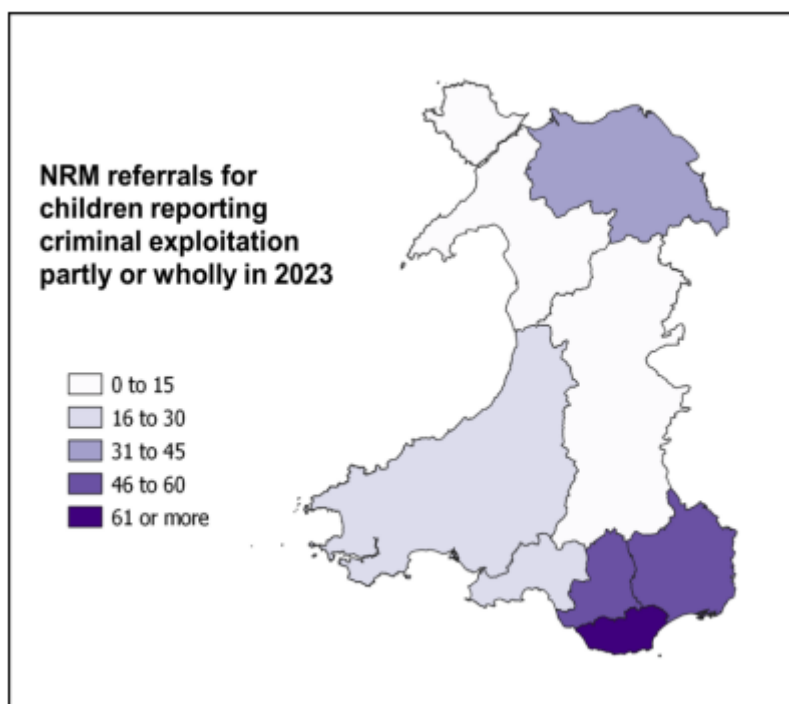
¹²⁶ [Written evidence, CYPM27 Welsh Women’s Aid](#)

¹²⁷ Jay, A. et al, ‘[Shattered lives, stolen futures. The Jay Review of Criminally Exploited Children](#)’, March 2024, page 67

¹²⁸ [Written evidence, CYPM28 National Youth Advocacy Service Wales \(NYAS Cymru\)](#); Children, Young People and Education Committee, ‘[Findings of stakeholder events](#)’, September 2024, page 13

¹²⁹ Children, Young People and Education Committee, [19 September 2024. Record of Proceedings](#), paragraphs 52-59

Figure 4: NRM referrals for children reporting criminal exploitation partly or wholly in 2023 across Welsh regions.¹³⁰



Responding to CCE

Working across jurisdictions: the legislative framework

86. Management of young offenders is reserved to the UK Government. However, youth justice services are provided by a range of different agencies, most of which have been devolved to the Welsh Government (e.g. education, housing, substance misuse, health, and social services). Leadership for youth justice in Wales is therefore delivered as a partnership between devolved and non-devolved organisations.¹³¹

87. The Youth Justice Blueprint for Wales is a Ministry for Justice and Welsh Government plan that aims to support young people in, or at risk of entering, the criminal justice system.¹³² The blueprint states that it takes a ‘children first’ and trauma-informed approach, with a focus on prevention to “Reduce the number of

¹³⁰ [Letter from the Cabinet Secretary for Social Justice, Trefnydd and Chief Whip and the Minister for Children and Social Care to the Chair of the Children, Young People and Education Committee](#), 9 October 2024

¹³¹ [Written evidence, MJW 11, Youth Justice Board](#)

¹³² Welsh Government, ‘[Supporting young people who offend](#)’, 21 May 2019

children in the youth justice system through effective diversion and prevent offending by addressing the vulnerabilities that often lead to crime.”¹³³

88. The British Psychological Society stressed to us the importance of the blueprint to create “a more effective, equitable, and compassionate system that addresses the root causes of youth offending.”¹³⁴ The Children’s Legal Centre Wales agreed, stating that “Youth Justice policy and practice over the last decade in Wales has evidenced significant success in diverting children from having contact with the law/becoming criminalised.”¹³⁵ The British Psychological Society noted a reduction of 28% in the number of first-time entrants to the Youth Justice System in Wales in 2021 compared with 2020,¹³⁶ which Care Inspectorate Wales also acknowledged, adding that the reduction could partly explain pressures in other parts of the child protection system.¹³⁷

89. However, avoiding criminalising young people does not necessarily mean that the perpetrators of CCE are being convicted. The Jay Review noted that the numbers of perpetrators convicted under the Modern Slavery Act has fallen in recent years to just one person in 2020-21. It concludes that, given the rapid rise in identification of children at risk of exploitation, “awareness of exploitation in children’s safeguarding is not translating into action in the criminal justice system”.¹³⁸

90. We heard similar concerns during our engagement activities. One stakeholder argued that adults who are involved in CCE as exploiters are not convicted for child abuse, they are convicted on drugs-related charges or other similar offences. In their view, this demonstrates that the system does not yet recognise that CCE is a form of child abuse.¹³⁹ Similarly, in conversation with young people and parents with lived experience of CCE, the Senedd’s Citizen Engagement Team heard that the police focus their efforts on young people rather than the higher-level individuals orchestrating criminal activities. Gangs know this, the participants told us, so will strategically use young people to transport money or drugs. We heard that by focusing their enforcement activities

¹³³ Ministry for Justice & Welsh Government, ‘[Youth Justice Blueprint for Wales](#)’, 21 May 2019

¹³⁴ [Written evidence, CYPM29 British Psychological Society \(BPS\)](#)

¹³⁵ [Written evidence, CYPM30 Children’s Legal Centre Wales](#)

¹³⁶ [Written evidence, CYPM29 British Psychological Society \(BPS\)](#)

¹³⁷ CYPE, [RoP: 20/03/24](#), paragraph 62;

¹³⁸ Jay, A. et al, ‘[Shattered lives, stolen futures. The Jay Review of Criminally Exploited Children](#)’, March 2024, page 48

¹³⁹ Children, Young People and Education Committee, ‘[Findings of engagement activities](#)’, September 2024, page 5

on vulnerable children, the police risk putting children in greater danger from both the criminal networks they serve and law enforcement itself.¹⁴⁰

91. To prevent exploiters accessing children at risk of exploitation, CASCADE argued in favour of a ‘Child Criminal Exploitation Order’, which would prevent perpetrators from being in or near the victim’s home for 28 days, to give professionals the chance to develop trust with children and their families so they can access specialised support.¹⁴¹ Others at our stakeholder events strongly advocated removing the exploiter from the child, rather than removing the child from their home environment. They argued that current practice of moving the child does not recognise that it is the exploiter, rather than the child, who should be disrupted. We heard that this approach is already taken with Child Sexual Exploitation, and needs to be adopted by statutory agencies in relation to CCE too.¹⁴²

The National Referral Mechanism (NRM)

92. The NRM is a framework that aims to identify and refer potential victims of modern slavery to the UK Home Office and ensure that they receive the appropriate support. Certain organisations, known as ‘first responders’, are authorised to refer a potential victim via an online portal.¹⁴³ If the Home Office believes that there is enough information to suggest that the child is a victim of modern slavery, this will result in a ‘Positive Reasonable Grounds Decision’ (or a Negative Reasonable Grounds Decision if the Home Office does not believe there is enough information to suggest that the child is a victim of modern slavery). A Positive Reasonable Grounds Decisions will result in further investigatory work, culminating in a ‘Conclusive Grounds Decision’, which, again, can be either positive or negative. A Positive Conclusive Grounds Decision can give police extra powers to arrest people believed to be exploiting the child, and can protect the child from being charged with certain criminal offences.¹⁴⁴

93. We heard mixed views about the NRM. The Jay Review concludes that, although a Positive Conclusive Grounds Decision is not legally binding, it can be a significant factor in whether the Crown Prosecution Service accepts that the child

¹⁴⁰ Citizen Engagement Team, ‘[Children and young people on the margins: Engagement findings](#)’, October 2024, pages 11-12

¹⁴¹ [Written evidence, CYPM13 CASCADE, Cardiff University](#)

¹⁴² Children, Young People and Education Committee, ‘[Findings of engagement activities](#)’, September 2024, page 6

¹⁴³ Gov.uk, ‘[National referral mechanism guidance: adult \(England and Wales\)](#)’, 14 May 2024

¹⁴⁴ Barnardo’s, ‘[What is an NRM? A guide for children and young people](#)’

is a victim.¹⁴⁵ Bridgend County Borough Council suggested that the NRM process has contributed to raising awareness of CCE amongst practitioners over the past three years.¹⁴⁶

94. However, some argued that the NRM is not fit for purpose, and was designed primarily for victims of modern slavery or trafficking, rather than victims of domestic criminal exploitation.¹⁴⁷ Others raised concerns about the long delays – up to 30 months – in waiting for a Conclusive Grounds Decision. Some stakeholders added that, in their view, even if a Positive Conclusive Grounds Decision is given, it doesn't necessarily mean the child gets any support, leaving them vulnerable to returning back to exploitative activities.¹⁴⁸ Others even told us that once exploiters know that a child has had an NRM in their name they will give that child additional criminal responsibilities, knowing that the likelihood of them being convicted is lower.¹⁴⁹

95. We heard calls for training to be rolled out to staff involved in NRM referrals, and for professionals submitting referrals to draw on the input of a range of agencies when making their referral, to give the NRM process every chance of truly benefitting the child.¹⁵⁰

96. When we asked the Cabinet Secretary for her views on the NRM, she told us that the Welsh Government recognises that there are “significant shortcomings” with the system, including significant waiting times for decisions. She told us that she had “repeatedly” highlighted to the Home Office the need for reform of the NRM system, and highlighted an active pilot in Wales to make the NRM a faster and more streamlined process.¹⁵¹

¹⁴⁵ Children, Young People and Education Committee, [‘Findings of stakeholder events’](#), September 2024, pages 13; Jay, A. et al, [‘Shattered lives, stolen futures. The Jay Review of Criminally Exploited Children’](#), March 2024, pages 46-47

¹⁴⁶ [Written evidence, CYPM11 Bridgend County Borough Council](#)

¹⁴⁷ [Written evidence, CYPM28 National Youth Advocacy Service Wales \(NYAS Cymru\)](#); Jay, A. et al, [‘Shattered lives, stolen futures. The Jay Review of Criminally Exploited Children’](#), March 2024, pages 46-47

¹⁴⁸ [Written evidence, CYPM13 CASCADE, Cardiff University](#); Jay, A. et al, [‘Shattered lives, stolen futures. The Jay Review of Criminally Exploited Children’](#), March 2024, pages 46-47

¹⁴⁹ Children, Young People and Education Committee, [‘Findings of engagement activities’](#), September 2024, page 7

¹⁵⁰ [Written evidence, CYPM11 Bridgend County Borough Council](#); [Written evidence, CYPM28 National Youth Advocacy Service Wales \(NYAS Cymru\)](#)

¹⁵¹ Children, Young People and Education Committee, [19 September 2024, Record of Proceedings](#), paragraphs 74-84

Collaboration between non-devolved and devolved agencies

97. In a detailed letter to us, Policing in Wales set out how police forces in Wales respond to CCE and focus on criminalisation as part of their strategic planning. Some police forces, such as Gwent and North Wales, have explicitly prioritised their responses to CCE, and have taken steps to work alongside other agencies to support children and their families both reactively and with preventative interventions. South Wales Police has identified children criminal and sexual exploitation as among the top 10 identified risks to the organisation, and gave evidence as part of the Jay Review of Criminally Exploited Children. The Policing in Wales letter stresses the value that all police forces place on multi-agency working, trauma-informed practice and early intervention work.¹⁵²

98. However, we heard different views about how non-devolved agencies, such as the police, work alongside devolved agencies or third sector organisations. Some felt that the police have become more collaborative, and we heard positive feedback about Police Community Support Officers (PCSOs) and Youth Justice Services in particular.¹⁵³ But more frequently, stakeholders reported that to us that working across the devolution threshold can be challenging. Barnardo's Cymru told us there were "different approaches to children and young people" between agencies governed by UK Government and Welsh Government. Welsh Women's Aid was more direct, stating that the Welsh Government and the then UK Government had been elected on different mandates, and that the criminal justice system is not aligned with Welsh social justice policy.¹⁵⁴ NYAS Cymru's written evidence struck a similar tone.¹⁵⁵

99. Some stakeholders felt that Wales does not receive sufficient funding from the UK Government to respond to CCE effectively. We heard from some professionals that the Home Office categorises regions as either primarily 'import' or 'export' areas for county lines activity. Wales is seen as an import area. They explained to us that Home Office money is primarily given to export areas. They felt that this meant that there is patchy financial support to address CCE in Wales. They argued that the issue is more complex than the current funding model

¹⁵² [Letter from Policing in Wales to the Chair of the Children, Young People and Education Committee](#), 23 August 2024

¹⁵³ Children, Young People and Education Committee, '[Findings of stakeholder events](#)', September 2024, pages 11-12

¹⁵⁴ [Written evidence, CYPM27. Welsh Women's Aid: Written evidence, CYPM30. Children's Legal Centre Wales](#)

¹⁵⁵ [Written evidence, CYPM28. National Youth Advocacy Service Wales \(NYAS Cymru\)](#)

suggests, and that in reality there is significant overlap between import/export areas.¹⁵⁶

100. We also heard calls for the devolution of youth justice to Wales, to provide a single source of governmental oversight and to ensure that Welsh Government’s policy of decriminalising children is not jeopardised by a legal framework overseen by the UK Government.¹⁵⁷

101. We asked the Cabinet Secretary whether she had any discussions with UK Government Ministers about ensuring that exploited children as seen as victims, rather than perpetrators of crime, and for her views on the devolution of justice. The Cabinet Secretary told us that she was seeking to influence the UK Government’s approach in relation to CCE, including the Welsh Government’s “children’s rights approach to youth justice”. She also confirmed that the Welsh Government would be seeking to take “a step forward” on the devolution of youth justice, which she argued would “make sense to deliver for young people”. She noted the recommendations to that effect from ex-Prime Minister Gordon Brown’s recent review, and urged us to reflect on the “importance of this for the inquiry”.¹⁵⁸

102. The Minister for Children and Social Care went on to discuss a future meeting with Jess Philips MP, Parliamentary Under-Secretary of State for Safeguarding and Violence Against Women and Girls, and committed to report back to us the outcomes of that meeting. She went on to note the porous border between Wales and England, and argued that:

“Where we can align our safeguarding practices with England, I think we should take the opportunity to seek to do that. I think that would help in terms of the practice, and it would help in terms of everybody understanding that when a child moves across borders that we’re all singing from the same song sheet. Because at the end of the day, what we should all be wanting is to make sure that these children are safeguarded, and

¹⁵⁶ Children, Young People and Education Committee, [‘Findings of stakeholder events’](#), September 2024, page 12

¹⁵⁷ [Written evidence, CYPM28 National Youth Advocacy Service Wales \(NYAS Cymru\): Written evidence, CYPM30 Children’s Legal Centre Wales](#)

¹⁵⁸ Children, Young People and Education Committee, [19 September 2024, Record of Proceedings](#), paragraphs 173-181

*safeguarded effectively, and it shouldn't really matter that one's in England and one's in Wales.*¹⁵⁹

The Welsh Government-led response

103. The Welsh Government explained that the action that must be taken by devolved agencies in response to a child experiencing, or at risk of experiencing, abuse and/or neglect is set out clearly in the All Wales Safeguarding Procedures. Their evidence paper set out that if a child/young person is identified as experiencing exploitation (criminal or sexual), children's services will arrange a strategy meeting with police and other agencies involved with the child and their family to consider what steps need to be taken to safeguard the child and any other vulnerable children. It also highlights:

- the Complex Safeguarding Wales Practitioner Toolkit, developed by CASCADE researchers, as part of a Health Care Research Wales-funded study into CCE in Wales, which provides support to devolved agencies as they respond to CCE; and
- the Anti-Slavery Wales Forum, which brings together multi-agency partners to tackle modern slavery and support people with lived experience of exploitation.¹⁶⁰

104. But despite the national-level guidelines and interventions set out by the Welsh Government, we heard that multi-agency working among devolved bodies can be challenging. During roundtable discussion, we heard that collaborating across social services, health, housing and education can be very difficult.¹⁶¹ The Association of School and College Leaders Cymru, Barnardo's Cymru and others went as far as questioning the effectiveness of the partnership working.¹⁶² Action for Children and the Children's Society, on the other hand, raised concern that the response to CCE is inconsistent across Wales, with the latter suggesting that local authorities varying approaches to recording and responding to CCE differently can lead to breakdowns in communication. They, and others, called for a national

¹⁵⁹ Children, Young People and Education Committee, [19 September 2024, Record of Proceedings](#), paragraphs 175-188

¹⁶⁰ Welsh Government, ['Children and Young People on the margins: Evidence to the Children, Young People and Education Committee'](#), September 2024, pages 13-14

¹⁶¹ Children, Young People and Education Committee, ['Findings of stakeholder events'](#), September 2024, page 11

¹⁶² [Written evidence, CYPM12 Association of School and College Leaders Cymru: Written evidence, CYPM21 Barnardo's Cymru](#); Children, Young People and Education Committee, ['Findings of stakeholder events'](#), September 2024, page 12

strategy/action plan to ensure a more consistent approach across agencies in Wales.¹⁶³

105. When we asked the Cabinet Secretary whether she was supportive of developing a national strategy to respond to CCE, she referred to guidance on safeguarding children from criminal exploitation in the All-Wales Practice Guides, and stressed the need for prevention and multi-agency working. Unfortunately, she did not directly answer our question.¹⁶⁴

Working with at-risk children

106. Despite the commitments in the Youth Justice Blueprint, we heard from various organisations that some practitioners working with children at risk of criminal exploitation have not embraced child-centred and trauma informed approaches. NYAS Cymru argued that children are often criminalised and viewed as perpetrators themselves, rather than exploited children, by law enforcement services.¹⁶⁵ Similarly, CASCADE told us that some professionals had reported to them that that “children who were looked after were ‘streetwise’ and knew ‘exactly what they are doing’”. They argued that this “adultification” should be challenged, because children cannot consent to exploitation.¹⁶⁶ Others shared similar views.¹⁶⁷

107. The young people who engaged with our Citizen Engagement Team stressed the need for a more targeted, community-focused approach to law enforcement, which fosters cooperation with young people, rather than criminalising them:

“There was an incident when I was 11. I kicked off and saw red. I was pinned down by six police officers, one on each limb and two on my shoulders. They stripped me naked in the police van to search me and then sectioned me in a mental hospital for adults cos they did not know what to do with me. It was humiliating.”

¹⁶³ [Written evidence, CYPM25B Action for Children; Written evidence, CYPM18 The Children's Society](#); Children, Young People and Education Committee, ‘[Findings of stakeholder events](#)’, September 2024, page 13

¹⁶⁴ Children, Young People and Education Committee, [19 September 2024, Record of Proceedings](#), paragraphs 65-66

¹⁶⁵ [Written evidence, CYPM28 National Youth Advocacy Service Wales \(NYAS Cymru\)](#); Children, Young People and Education Committee, ‘[Findings of engagement activities](#)’, September 2024, page 5

¹⁶⁶ [Written evidence, CYPM13 CASCADE, Cardiff University](#)

¹⁶⁷ Children, Young People and Education Committee, ‘[Findings of engagement activities](#)’, September 2024, page 6

We heard that experiences like these leave young people feeling humiliated, and reinforced their feelings of vulnerability. Participants recommended initiatives within schools to introduce children to local law enforcement early on, hoping that such efforts could help bridge the trust gap between police and the community.¹⁶⁸

108. During our engagement activities, we heard that many children who get involved in criminal activity feel more accepted by the margins of society than they do by their families or mainstream services. One professional told us that some children actively want to be involved in a gang to feel like they belong, perhaps as a substitute for strong parent figures. Others told us that some of the children they work with – who have been involved in criminal activity – are not even aware that they have been exploited, and sometimes don't want support.¹⁶⁹

109. Our evidence suggests that forming positive, trusting relationships with at risk children and their families is crucial if they are to be diverted away from criminal activity, and to protect them if they do become exploited.¹⁷⁰ Bridgend County Borough Council advocated for a small team of staff to be the point of contact with children at risk of exploitation, to help build positive relationships without involving social workers.¹⁷¹

110. In its evaluation of Action for Children's Serious Organised Crime Early Intervention Service (SOCEIS), CASCADE attributed the service's success to intensive, child-focussed support provided by practitioners and mentors, which helped them build trusting relationships with children.¹⁷² The Jay Review also highlights the importance of peer mentoring, including by practitioners with lived experience of exploitation:

“Witnesses described the key qualities that made mentoring so valuable as being the consistency offered, the time taken to build up a trusted relationship with the child and their family, and truly understanding the child's perspective as a way to

¹⁶⁸ Citizen Engagement Team, '[Children and young people on the margins: Engagement findings](#)', October 2024, page 12

¹⁶⁹ Children, Young People and Education Committee, '[Findings of engagement activities](#)', September 2024, page 5

¹⁷⁰ Children, Young People and Education Committee, '[Findings of engagement activities](#)', September 2024, page 7

¹⁷¹ [Written evidence, CYPM11 Bridgend County Borough Council](#)

¹⁷² CASCADE, '[Serious Organised Crime Early Intervention Service Evaluation: Executive summary](#)', March 2024, pages 8-10

*advocate on their behalf and help them, in turn, see the possibilities for the future.*¹⁷³

Case study: Action for Children’s Serious Organised Crime Early Intervention Service (SOCEIS)

Action for Children’s Serious Organised Crime Early Intervention Service (SOCEIS) aims to identify young people involved in, or at risk of, involvement in serious organised crime, addressing the vulnerabilities that led to their involvement and diverting them towards more positive pathways.

The service was established in Glasgow in 2013. Since then, it has expanded to help children at risk in eight areas of the UK. Action for Children began delivering the service in Cardiff in 2020, and expanded to Flintshire in 2023. Before launching the service in a new area, work was carried out to determine the feasibility and requirement for a criminal exploitation diversion service through consultation with key stakeholders. This work determined the need, threat types, and partnership working arrangements to ensure there would be not duplication of effort across agencies.

CASCADE’s evaluation of SOCEIS concludes that:

“The Service has established itself as a specialist service for young people involved in serious organised crime or affected by exploitation. Findings showed high levels of engagement

The Service gave young people a safe space to reflect on their lives and consider their existing relationships and the potential consequences of remaining on those negative pathways.

*Unlike time-limited interventions, the Service was able to stay with young people and deliver intensive, tailored support at the young person’s pace which was cognisant of their developmental needs rather than age based provision. This was facilitated by the recruitment of highly skilled Practitioners and Peer Mentors from the local communities where young people lived.*¹⁷⁴

¹⁷³ Jay, A. et al, ‘[Shattered lives, stolen futures. The Jay Review of Criminally Exploited Children](#)’, March 2024, pages 36-38

¹⁷⁴ CASCADE, ‘[Serious Organised Crime Early Intervention Service Evaluation: Executive summary](#)’, March 2024, pages 2-3 and 9-10

The Cardiff SOCEIS service is now sustained by the Shared Prosperity Fund through Cardiff Council. Action for Children reports that the CASCADE evaluation found that, out of a total of 30 closed cases, the service has led to:

- 77% experienced reduced offending.
- Two-thirds showed a reduction in exploitation.
- 63% improved their decision-making regarding risk.
- Two-fifths enhanced engagement with education, employment, or training.
- Two-thirds reported improved family relationships.¹⁷⁵

111. There was general agreement that professionals who might come into contact with children at risk of criminal exploitation should receive better training to help them identify the dangers and respond appropriately. Barnardo's Cymru stressed the importance of practitioners understanding the speed at which exploitative situations can escalate, and noted that some find it difficult to de-escalate situations.¹⁷⁶ Welsh Women's Aid told us that some cases aren't taken seriously enough by certain services, leaving young people to fall through the cracks without the critical support they need,¹⁷⁷ and Bridgend County Borough Council advocated support for teachers to manage the trauma associated with exploitation.¹⁷⁸ Action for Children shared with us the findings of ongoing research carried out by CASCADE in its written evidence: interim analysis of data from 116 survey responses from CCE practitioners indicates that formal training and policy and practice guidance were the two most important areas to influence their response to criminally exploited children.¹⁷⁹ We heard consistent calls for a standard set of training for all practitioners working with children and young people, and funding for it to be rolled out to everyone working with criminalised children.¹⁸⁰

Ongoing support for previously exploited children

112. The Jay Review explains that the process of moving away from exploitation can be very difficult for children and their families. It finds that threats to children

¹⁷⁵ [Written evidence, CYPM25B Action for Children](#)

¹⁷⁶ [Written evidence, CYPM21 Barnardo's Cymru](#)

¹⁷⁷ [Written evidence, CYPM27 Welsh Women's Aid](#)

¹⁷⁸ [Written evidence, CYPM11 Bridgend County Borough Council](#)

¹⁷⁹ [Written evidence, CYPM25B Action for Children](#)

¹⁸⁰ Children, Young People and Education Committee, '[Findings of stakeholder events](#)', September 2024, page 13

can escalate at a point at which a young person is attempting to extricate themselves, and that children can be at risk being of being re-exploited despite having been moved to a place of temporary safety.¹⁸¹ The young people with lived experience who engaged with us shared similar views. They told us that “getting out” can require drastic measures, such as relocating, to ensure their safety and to sever ties with negative influences. But they stressed that without reliable, long-term support, the cycle of criminal activity can feel impossible to escape:

“It’s hard to get out because you’re known and you’ve got a history... You’ve got to safeguard yourself even going around wearing a stab-proof vest. Things should be put in place to make it easier for a person of such high status to get out.”¹⁸²

113. We heard from various stakeholders and professionals across sectors that once vulnerable children leave secure accommodation, specialist residential care, or even foster care, there is very little ‘step down’ provision to support them to take positive onward steps in their lives. They worried that if young people make progress through the support they receive from professionals, once they leave that safe setting they may have no choice but to return to their previous troubled circumstances, and will inevitably face the same risks as before. We heard about shortages of community placements for vulnerable children leaving secure care in particular.¹⁸³ Some young people also told us also that having a criminal record as a consequence of being criminally exploited can be a barrier to employment, which can make it very difficult to leave criminal activity. They urged us to consider ways to remove barriers to lawful employment for young people who have a criminal record as a result of being criminally exploited.¹⁸⁴

Our view

A statutory definition of Criminally Exploited Children

114. One of the most consistent themes that we have identified across our evidence gathering is that the policy response to children who are criminally exploited has not always kept pace with the evolving nature of the exploitation. Exploitative adults move quickly to adapt their coercive tactics to evade

¹⁸¹ Jay, A. et al, ‘[Shattered lives, stolen futures. The Jay Review of Criminally Exploited Children](#)’, March 2024, page 31

¹⁸² Citizen Engagement Team, ‘[Children and young people on the margins: Engagement findings](#)’, October 2024, page 13

¹⁸³ Children, Young People and Education Committee, ‘[Findings of engagement activities](#)’, September 2024, page 7

¹⁸⁴ Citizen Engagement Team, ‘[Children and young people on the margins: Engagement findings](#)’, October 2024, page 6

safeguarding and criminal justice initiatives. From the evidence that we have collected, the absence of a statutory definition of CCE has directly contributed to a lack of understanding of CCE, a lack of clear leadership in tackling it, and undermined attempts to prosecute exploiters.

115. We recognise that the Welsh Government has its own definition of CCE, set out in the All Wales Practice Guide, and we were pleased to hear some key stakeholders acknowledging the value of that non-statutory definition to drive consistency in safeguarding practice across Wales. We also recognise that criminal justice is a reserved matter, and that the Welsh Government cannot, at present, legislate to create a statutory definition of CCE. The Cabinet Secretary for Social Justice, Trefnydd and Chief Whip told us that she will consider the forthcoming UK Government Crime and Policing Bill before coming to a view on whether a statutory definition is required. But she need only read the evidence submitted to this inquiry to understand the arguments in favour of a statutory definition. We believe that now, rather than once the Bill has been drafted, is the time to influence the UK Government's thinking in this area.

Recommendation 4. The Welsh Government should write to the UK Government to advocate for a statutory definition of Child Criminal Exploitation as part of its forthcoming Crime and Policing Bill. The Welsh Government should report back to us with the response it receives, which should also include a summary of any relevant inter-governmental discussions that have taken place since September 2024.

Wales' response to CCE

116. We were encouraged to hear positive feedback from practitioners about the Youth Justice Blueprint for Wales, which prioritises preventing children from offending in the first place, rather than dealing with the consequences of children entering the youth justice system. We particularly welcome the evidence submitted to us setting out that the blueprint has contributed to a significant fall in the number of first-time entrants to the Youth Justice System. This is a significant achievement, and it deserves recognition. We hope that the police and other safeguarding agencies across Wales continue to build on this success, driven by the child first and trauma informed approach to working with vulnerable children that has been promoted to us so consistently by stakeholders.

117. We were less encouraged, however, by concerns about the lack of a consistent approach across agencies in Wales to tackling CCE. We are therefore interested in the value of calls for a national CCE strategy that we heard during

our evidence gathering. It was unfortunate, therefore, that the Cabinet Secretary did not share her views on such a proposal during oral scrutiny.

Recommendation 5. The Welsh Government should set out its views on the benefits or otherwise of a national strategy to respond to Child Criminal Exploitation in light of the concerns raised in this report about inconsistency of practice across Wales.

Other marginalised children

118. Our inquiry focuses on missing children and criminally exploited children. However, we asked stakeholders to highlight other groups of children on the margins to help us understand the wider context within which children become marginalised. We understand that issues relevant to homeless children and sexually exploited children are highly nuanced. The paragraphs below are not meant to be exhaustive, and do not do justice to the complexity of these issues. They are recorded here as a complete reflection of the evidence we received, and to support us as we consider missing children and criminalised children within the context of the wider, interconnected issues facing vulnerable children and young people.

Homeless children

119. Cymorth Cymru set out statistics demonstrating the scale of homelessness among children in Wales. On 31st January 2024:

- A total of 11,501 individuals were in temporary accommodation in Wales and 3,104 of these were dependent children aged under 16.
- 3,709 people in Wales were staying in ‘bed and breakfasts and hotels’, of which 702 were dependent children under 16.

They also highlighted research for Crisis, which found that 50% of the 480 single homeless people in their UK-wide sample first become homeless before the age of 21. Further analysis found that the group of single homeless adults with the most adverse life experiences were particularly likely to have first experienced homelessness as a young person, nearly all had been excluded from school, and three quarters had been in local authority care. They highlighted the findings of a separate study, carried out by Shelter Scotland, which found that 84% of homeless young people had run away before the age of 16.¹⁸⁵

¹⁸⁵ [Written evidence, CYPM31 Cymorth Cymru](#)

120. Some stakeholders highlighted that homeless children are exposed to heightened risks of exploitation or abuse. The Jay Review highlighted that homeless children face vulnerability including a lack of safe and stable living environments, absence of support networks, financial instability, and heightened risks of exploitation and abuse.¹⁸⁶ St Giles Trust told us that:

“Children who are homeless and/or in temporary accommodation are, in our experience, particularly likely to be exposed to the risk of exploitation and to be groomed by gangs.”¹⁸⁷

Barnardo’s Cymru agreed, as did Cymorth Cymru, which added that homeless children are at a significantly higher risk of county lines exploitation in particular, and are recognised as such by the Home Office.¹⁸⁸ NYAS Cymru raised particular concern about care leavers – who are at a particularly high risk of homelessness – and the associated heightened risk of missing incidents and being exploited.¹⁸⁹

121. The evidence that we received about responding to homelessness amongst children, mainly from Cymorth Cymru, argued for services to understand the impact of trauma and adverse childhood experiences on young people who are at risk of, or who have experienced, homelessness. They argued that this can “have a significant impact on their ability and willingness to trust services, and can also impact on their ability to regulate their emotions when they are upset or frustrated”. They advocated Housing First for Youth services, which they said has been shown to be effective when offered to care-experienced young people and requires intensive multi-agency support to be provided, and Upstream Cymru, as examples of effective early intervention.¹⁹⁰

122. Both Cymorth Cymru and NYAS Cymru submitted evidence about the Welsh Government’s proposed homeless legislation.¹⁹¹ The former were largely supportive of the proposals.¹⁹² However, NYAS Cymru raised concern about the impact of the proposed removal the overall category of ‘priority need’ under homelessness legislation, a category which currently affords priority for accommodation to homeless 18-20 year olds who are care leavers:

¹⁸⁶ Jay, A. et al, [‘Shattered lives, stolen futures. The Jay Review of Criminally Exploited Children’](#), March 2024, page 22

¹⁸⁷ [Written evidence, CYPM19 St Giles Trust](#)

¹⁸⁸ [Written evidence, CYPM21 Barnardo’s Cymru](#); [Written evidence, CYPM31 Cymorth Cymru](#)

¹⁸⁹ [Written evidence, CYPM28 National Youth Advocacy Service Wales \(NYAS Cymru\)](#)

¹⁹⁰ [Written evidence, CYPM31 Cymorth Cymru](#)

¹⁹¹ Welsh Government, [‘White Paper on ending homelessness in Wales’](#), 23 April 2024

¹⁹² [Written evidence, CYPM31 Cymorth Cymru](#)

“Abolishing the priority need assessment would place more care-experienced young people in vulnerable situations, such as at risk of exploitation or missing incidents, and therefore NYAS Cymru recommends for the Welsh Government to not abolish it.”¹⁹³

123. Welsh Government data sets out that the number of care leavers (up to the age of 25) who experience homelessness during the year across Wales rose from 170 in 2020-21, to 315 in 2022-23.¹⁹⁴ In January 2024, we responded to the Welsh Government’s consultation on the White Paper on ending homelessness in Wales. Drawing on the findings of our 2022-23 inquiry into the care system¹⁹⁵ we, like NYAS Cymru, raised concern about the potential unintended negative consequences of abolishing priority need assessments for care experienced people. We urged the Welsh Government to undertake an impact assessment to identify any unintended negative consequences of abolishing priority need on care experienced people who present as homeless, or are at risk of homelessness.¹⁹⁶

124. In her response, the then Minister for Climate Change noted and shared our concerns, but stressed that “the White Paper and subsequent legislation provide an important opportunity to address these concerns and transform the experience of these young people as they transition from care towards independent living.”¹⁹⁷

Sexually exploited children

125. There is no statutory definition of Child Sexual Exploitation (CSE) in Wales.¹⁹⁸ However, the Welsh Government offers a definition of CSE in statutory guidance issued under section 28 of the Children Act 2004 and section 139 of the Social Services and Well-being (Wales) Act 2014:

“Child Sexual Exploitation (CSE) is a form of child sexual abuse, which involves an element of exchange between the abused

¹⁹³ [Written evidence, CYPM28 National Youth Advocacy Service Wales \(NYAS Cymru\)](#)

¹⁹⁴ [StatsWales, ‘Children looked after during the year, by local authority’](#)

¹⁹⁵ [Children, Young People and Education Committee, ‘If not now, then when? Radical reform for care experienced children and young people’, May 2023, pages 122 to 124](#)

¹⁹⁶ [Letter from the Chair of the Children, Young People and Education Committee to the Minister for Climate Change, 10 January 2024](#)

¹⁹⁷ [Letter from the Minister for Climate Change to the Chair of the Children, Young People and Education Committee, 6 February 2024](#)

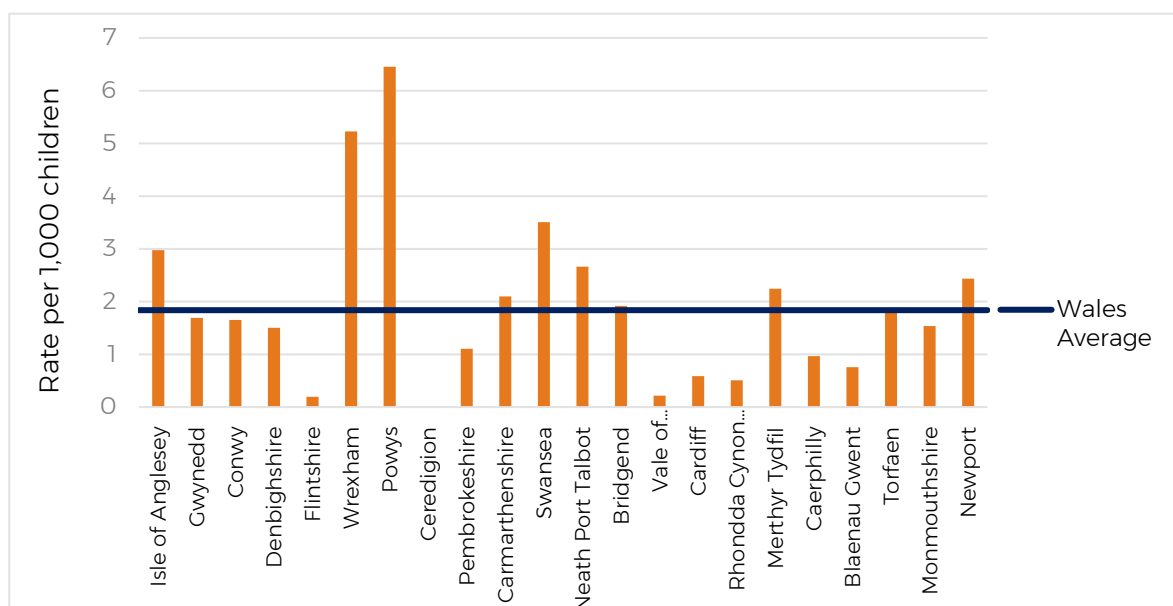
¹⁹⁸ [Independent Inquiry Child Sexual Abuse, ‘Child sexual exploitation by organised networks investigation report’, October 2022](#)

*child (up to the age of 18 years) and the person perpetrating or facilitating the abuse.*¹⁹⁹

126. As with both missing children and CCE, stakeholders reported that the lack of a clear definition of CSE means it is difficult to ascertain the true nature and scale of CSE in Wales. The Welsh Local Government Association called it a “hidden issue”, about which relatively few survivors speak out, particularly boys. Nevertheless, they argued that we can be certain that it is happening in Wales, and is not limited to any particular geography, ethnic or social background.²⁰⁰ Voices from Care Cymru agreed, telling us that sexual exploitation is a significant issue facing children across Wales.²⁰¹

127. The Welsh Government publishes data from local authorities setting out the number of strategy meetings about children at which child sexual exploitation was a factor (see figure 5 below). This data cannot be used to accurately compare the rates of CSE from year to year due to differences in reporting guidelines. The Welsh Government also notes that there are imperfections in the data.

Figure 5: The rate per 1,000 children of strategy meetings about a child where ‘child sexual exploitation’ was the primary exploitation factor in 2022-2023. The same child may be associated with multiple reports of child sexual exploitation.²⁰²



¹⁹⁹ Welsh Government, ‘Social Services and Well-being (Wales) Act 2014: Working Together to Safeguard People. Volume 7 - Safeguarding Children from Child Sexual Exploitation’, February 2021

²⁰⁰ Written evidence, CYPM26 Welsh Local Government Association

²⁰¹ Written evidence, CYPM14 Voices from Care Cymru

²⁰² StatsWales, ‘Number of children reported during the year where child exploitation was a factor, by local authority’. See the narrative in the footnote associated with figure 3 for more information

128. Welsh Women’s Aid reported data from the National Police Chiefs’ Council, which found that there were around 107,000 child sexual abuse and exploitation offences in 2024 across England and Wales. They added that they sent Freedom of Information requests on the scale of CSE to local authorities, health boards, police forces and police and crime commissioners, and reported that less than half were able to provide any data.²⁰³

129. We heard evidence challenging stereotypical assumptions about what sexually exploitation is, and who the victims of it are. Barnardo’s Cymru told us that it is not necessarily accurate to associate girls with sexual exploitation and boys with criminal exploitation. “This pattern has changed, particularly with regards to seeing boys becoming victims of child sexual exploitation.”²⁰⁴ Similarly, although St Giles Trust told us that almost all of the girls they support as victims of criminal exploitation are also victims of sexual exploitation, a high proportion of the boys are, too.²⁰⁵

130. Some stakeholders stressed to us that the methods of exploitation have changed, as the Welsh Local Government Association explained:

“They use sophisticated methods to steer victims into engaging in inappropriate sexual chat, sexual activity over a webcam or posting indecent images of themselves, often without any initial gain or payment. These exploitative relationships can quickly run out of control for young people who, having compromised themselves online, can be threatened and blackmailed. Online relationships can also have serious off-line consequences particularly when children and young people are encouraged to meet up with people in the real world who they first met online.”²⁰⁶

131. Stakeholders generally agreed that multi-agency working was critical to responding effectively to CSE.²⁰⁷ However, we also heard concerns that the response to CSE isn’t always effective. Welsh Women’s Aid welcomed the Welsh Government’s “strong intentions in this area”, but criticised “piecemeal”

about how this data is collected. This data is set against: Office of National Statistics, ‘[Estimates of the population for the UK, England, Wales, Scotland, and Northern Ireland](#)’, 8 October 2024

²⁰³ [Written evidence, CYPM27 Welsh Women’s Aid](#)

²⁰⁴ [Written evidence, CYPM21 Barnardo’s Cymru](#)

²⁰⁵ [Written evidence, CYPM19 St Giles Trust](#)

²⁰⁶ [Written evidence, CYPM26 Welsh Local Government Association](#); Children, Young People and Education Committee, ‘[Findings of stakeholder events](#)’, September 2024, page 14

²⁰⁷ [Written evidence, CYPM26 Welsh Local Government Association](#); [Written evidence, CYPM20 Estyn](#); [Written evidence, CYPM27 Welsh Women’s Aid](#)

strategies.²⁰⁸ Other agencies shared similar concerns. Barnardo's Cymru reported that practice has not kept pace with the changing nature of CSE,²⁰⁹ whereas Welsh Women's Aid observed a lack of joined-up working, and "a notable lack of support for young people aged 16-18, which is key to early intervention and prevention of further adult exploitation". They concluded that children and young people are often unable to access support they need in a timely manner.²¹⁰ Voices from Care Cymru shared a tragic case study with us to demonstrate the consequences of failed multi-agency working to tackle CSE:

"... during lockdown we were supporting a young woman who had been at the edge of prostitution and had issues with substance abuse. During lockdown it was harder for her exploiters to access her and we tried very hard to get support for her at that time, from housing, from mental health services and from social services, but no support was forthcoming. When lockdowns were lifted her exploiters accessed her again, and her situation became worse and worse. Since she had turned 18 social services treated her as a young adult free to make bad decisions. Mental health waiting lists were impossibly long and because of the chaos in her life she missed appointments and they refused to treat her. She wasn't able to maintain a tenancy. The only agency that took her situation seriously was the police, and they did try to protect her, but there was a limit to what they could do without co-operation from other agencies. Sadly, she eventually took her own life. This is an extreme example, but not by any means unique."²¹¹

132. We asked the Minister for Children and Social Care about the forthcoming child sexual abuse action plan, scheduled to be published in 2025. We also asked whether she agreed that child sexual exploitation is a growing problem, and for her views on the changing nature of child sexual exploitation, driven by advancing technology. In response, she told us that the Welsh Government, regional safeguarding boards and other statutory and non-statutory partners – including victims of sexual exploitation – are working together to build on the former iteration of the plan. She confirmed that the new plan will include consideration of preventative actions, and raising awareness with the public about child abuse

²⁰⁸ [Written evidence, CYPM27, Welsh Women's Aid](#)

²⁰⁹ [Written evidence, CYPM21, Barnardo's Cymru](#)

²¹⁰ [Written evidence, CYPM27, Welsh Women's Aid](#)

²¹¹ [Written evidence, CYPM14, Voices from Care Cymru](#)

and how to report it, support for parents, and ensuring that children are believed when they disclose abuse.²¹²

Our view

Homeless children

133. Homelessness is a symptom of marginalisation. Homeless children and young people have often experienced trauma that pushes them out of their homes. Many have been excluded from school, are financially vulnerable, and lack support networks such as a loving family.

134. Homelessness is also a risk factor of further marginalisation. Homeless children and young people are at heightened risk of abuse or exploitation. We understand from this inquiry and our work on the care system that many young people who are placed in temporary accommodation such as hostels or bed and breakfasts are exposed to dangers that they otherwise may not encounter. They may come into increased contact with alcohol, drugs, and criminal gangs. We were struck by the findings from Crisis indicating that single homeless adults with the most adverse life experiences were likely to have first experienced homelessness as a young person. We should expect that children and young people who are forced to endure homelessness will encounter significant and potentially unsurmountable challenges throughout their lives.

135. We remain concerned, therefore, about the significant unintended consequences which are likely to arise from Welsh Government's proposals to abolish the priority need test for people presenting as homeless or being threatened with homelessness. For care experience children and young people in particular, for whom the state has direct responsibilities as corporate parents, and amongst whom homelessness is unacceptably prevalent, this policy proposal may have profoundly negative consequences. We therefore reiterate our conclusions in both our 2023 report on the care system and in our 2024 letter to the then Minister for Climate Change.

Recommendation 6. In its forthcoming legislation, the Welsh Government should:

²¹² Children, Young People and Education Committee, [19 September 2024, Record of Proceedings](#), paragraphs 86-87

- ensure that care experienced children and young people who are, or who are at risk of becoming, homeless retain a legal priority in relation to other categories of homeless applicant; and
- create a mandatory 'reasonable preference' category for people who are care experienced (regardless of homelessness status) in local authorities' social housing allocation schemes.

136. If the Welsh Government is not minded to accept our Recommendation 6, it should carry out and publish an impact assessment of its decision.

Recommendation 7. If the Welsh Government is not willing to keep priority need status for care experienced young people, it should carry out and publish within 6 months of the publication of this report a robust assessment of the impacts of removing priority need status on care experienced people.

Sexually exploited children

137. Like homelessness amongst children, the sexual exploitation of children is a critically important and complex issue that warrants its own dedicated Committee inquiry. Sexually exploited children are, quite clearly, a marginalised group who suffer intolerable and unimaginable trauma.

138. For the purposes of this report, which focuses primarily on missing and criminally exploited children, we note the similar patterns of exploitation and grooming that lead to children being sexually exploited as those that lead to children being criminally exploited. We recognise that certain unhelpful stereotypes about the likely victims of exploitation remain – specifically that girls are sexually exploited, whereas boys are criminally exploited. These assumptions need to be challenged.

139. Many of the issues we explore later in this report are relevant to sexually exploited children: multi-agency working, information sharing, and removing – or limiting the impact of – the risk factors that lead to children becoming marginalised. We hope that the recommendations we make in those areas will contribute to a more effective holistic response to children at risk of sexual exploitation.

140. But we must recognise that methods of sexual exploitation are constantly evolving, just as criminal gangs will adapt their techniques of criminal exploitation. New technology and digital platforms provide sexual exploiters with tools to manipulate and take advantage of children. Policy makers must ensure that they

are cognisant of the pace of change, and continually update their response accordingly. We welcome the review and update of the Welsh Government's child sexual abuse action plan in 2025, and urge the Minister to ensure that the review is informed by the views and experience of frontline professionals and people with lived experience of sexual exploitation.

3. Cross-cutting themes relevant to marginalised children

Some of the issues that were raised with us during our evidence gathering were specific to certain groups of marginalised children, as discussed above. However, these groups are not mutually exclusive, and vulnerable children may well fall into more than one. Some of the issues relevant to supporting children in one of these groups will also be relevant to children in others. Here, we consider cross-cutting issues that relate to marginalised children generally.

Multi-agency working

Beyond social services

141. Perhaps the clearest and most consistent message that we received, mirroring the findings of other studies into vulnerable children²¹³, was that successfully safeguarding vulnerable children requires effective multi-agency working.²¹⁴ As Social Care Wales told us:

“If we don’t have the health service, the police service, education and social care working together with those very vulnerable children—. You can’t rely on social services alone. These are very complex matters that happen in people’s lives. My suggestion would be you look at it from a multi-agency perspective. You’re going to miss a fundamental thing, I believe, if you only focus on children’s social services.”²¹⁵

²¹³ Jay, A. et al, [‘Shattered lives, stolen futures. The Jay Review of Criminally Exploited Children’](#), March 2024, page 58

²¹⁴ Children, Young People and Education Committee, [‘Findings of engagement activities’](#), September 2024, pages 9-10

²¹⁵ Children, Young People and Education Committee, [20 March 2024. Record of Proceedings](#), paragraph 338

142. Wales has six Regional Safeguarding Board, and one National Safeguarding Board. The boards are multi-agency partnerships with responsibility to oversee the safety and well-being of children and young people at a regional and national level. It is clear that Regional Safeguarding Boards are a key platform for multi-agency working for some public bodies.²¹⁶ However, some stakeholders from both statutory and non-statutory agencies told us that the regional and national safeguarding boards don't seem to be meeting as often as they should, and there were concerns that they are resisting taking ownership of CCE.²¹⁷

143. Multi-agency working in relation to marginalised children is not only carried out via the safeguarding boards. Both Estyn and Care Inspectorate Wales stressed the value of their work carrying out joint inspections of child protection arrangements alongside Healthcare Inspectorate Wales and His Majesty's Inspectorate of Constabulary and Fire & Rescue Service. Estyn told us that the inspections shone a spotlight on the multi-agency work being done to identify and support children on the margins. Estyn in particular expressed disappointment that, due to current financial challenges across public services, there were no confirmed plans to continue the inspections.²¹⁸ The Welsh Government's Deputy Director of Social Services Improvement shared similar positive feedback about the impact of the joint inspections during oral scrutiny, and the Minister for Children and Social Care subsequently confirmed to us that the funding for these would continue.²¹⁹

144. For some, successful multi-agency working depended on having one individual or organisation who coordinated support for the child and their family. We heard from our engagement visits that, without one professional being the primary contact, families can get overwhelmed by the number of different professionals in their lives.²²⁰ Other stakeholders, including the British Psychological Society, emphasised the need for professionals to understand who is coordinating the support for the family to make sure the work of different

²¹⁶ [Letter from Policing in Wales to the Chair of the Children, Young People and Education Committee](#), 23 August 2024; [Letter from Hywel Dda University Health Board to the Chair of the Children, Young People and Education Committee](#), 23 August 2024

²¹⁷ Children, Young People and Education Committee, ['Findings of stakeholder events'](#), September 2024, page 12

²¹⁸ [Written evidence, CYPM20 Estyn](#), Children, Young People and Education Committee, [20 March 2024, Record of Proceedings](#), paragraph 59

²¹⁹ Children, Young People and Education Committee, [19 September 2024, Record of Proceedings](#), paragraphs 109 & 122-126

²²⁰ Children, Young People and Education Committee, ['Findings of engagement activities'](#), September 2024, page 10

agencies dovetails effectively.²²¹ Bridgend County Borough Council suggested that social work assistants could take on a co-ordination role by being the primary points of contact about exploitation to education, health and police and all partner agencies, and could also carry out return home interviews.²²²

145. When providing oral evidence to the Senedd's Equality and Social Justice Committee about young people with speech, language and communication needs in the criminal justice system, the Youth Justice Board concluded that "Welsh Government, and all youth justice delivery partners, are very focused on positive outcomes for children. I think, sometimes, the challenge is just making sure that we all work collectively."²²³

146. We asked the Cabinet Secretary how the Welsh Government is ensuring effective co-ordination between police, health boards, local authorities and other agencies. She stressed that there are statutory duties on local authorities and other partners, including the police, health boards, and young offending teams, to promote co-operation and protect children and adults at risk. She went on to explain that the National Independent Safeguarding Board has commissioned research from Manchester Metropolitan University to work with regional safeguarding boards to develop a performance management framework for multi-agency working. The Cabinet Secretary emphasised that the responsibility for that framework would lie with regional safeguarding boards.²²⁴

147. We pressed the Welsh Government on how often the safeguarding boards meet, following on from concerns raised to us from stakeholders. The Welsh Government subsequently set out that the Regional Safeguarding Boards meet on a quarterly basis, and the National Independent Safeguarding Board meets monthly. However, the letter did not confirm how often the boards have *actually* met, as opposed to how often they are *supposed* to meet.²²⁵

148. The Minister for Children and Social Care discussed the new Single Unified Safeguarding Review process, which is being introduced from October 2024. She

²²¹ [Written evidence, CYPM29 British Psychological Society \(BPS\); Written evidence, CYPM22 Paige Monaghan, Dr Sara Waring, Dr Susan Giles \(University of Liverpool\), and Dr Freya O'Brien \(Liverpool John Moores University\)](#)

²²² [Written evidence, CYPM11 Bridgend County Borough Council](#)

²²³ [Equality and Social Justice Committee, 5 December 2022, Record of Proceedings](#), paragraph 334

²²⁴ [Children, Young People and Education Committee, 19 September 2024, Record of Proceedings](#), paragraphs 107-108 & 157-167

²²⁵ [Letter from the Cabinet Secretary for Social Justice, Trefnydd and Chief Whip and the Minister for Children and Social Care to the Chair of the Children, Young People and Education Committee](#), 9 October 2024

explained that, rather than individual agencies overseeing safeguarding reviews, the single review process will be a multi-agency process that draws together any recommendations that come out of individual reviews, and place them in a single repository to improve information sharing. The repository will be supervised by a ministerial oversight group. The Welsh Government stressed that this new model is “pioneering” and “world-leading”, and would be used to inform and strengthen the roles of the regional safeguarding boards in future.²²⁶

149. The purpose of safeguarding reviews is to consider cases after the event, following serious incidents of known or suspected abuse or neglect of a child. By then, things have gone wrong – with tragic consequences for children and their families. We asked the Minister for clarity what value the review offered to break down barriers to information sharing *before* things go wrong:

“... the SUSR, yes, is about reviews when things have gone wrong, but more importantly, they’re about how we prevent things from going wrong in the future. Without repeating everything that we’ve said before, it is about all of those agencies working together and working effectively and sharing information with each other.”²²⁷

150. However, the Children’s Commissioner for Wales has since raised concern about the governance and accountability of the proposed safeguarding review process, including about ensuring that:

- lessons from reviews are shared and actions are identified on an all-Wales basis;
- action plans that are intended to implement recommendations from reviews are taken forward and achieved, and who will have oversight of this; and
- recommendations from reviews are suitably framed so they don’t just apply to the regional area undertaking the Review.²²⁸

151. In a recent evidence session with us, she discussed her concerns in more detail:

²²⁶ Children, Young People and Education Committee, [19 September 2024, Record of Proceedings](#), paragraphs 161, 171-174

²²⁷ Children, Young People and Education Committee, [19 September 2024, Record of Proceedings](#), paragraphs 190-192

²²⁸ Children’s Commissioner for Wales, [‘Annual Report & Accounts 2023-24’](#), October 2024, page 28

“... that is the crux of the concerns that we have: it’s, again, accountability. Who is ultimately responsible? Under the new guidance, under the new arrangements, it’s still the case that the recommendations from CPRs [Child Protection Reviews] just continue to be owned by the safeguarding boards, by the owners of those reviews, and it’s not anyone else’s duty to actually implement those recommendations. So, there’s a lack of oversight over whether and how recommendations are implemented... What the new arrangements bring that wasn’t there previously is effectively a repository of previous and existing CPRs or SUSRs. So, it’s a database... We still have many unanswered questions about the processes by which the repository will be utilised.”²²⁹

152. The Commissioner’s Head of Policy and Public Affairs went on to raise concern about the Welsh Government’s role specifically in the SUSR process:

“... all reports are sent to Welsh Government as matter of course, before they’re published, and the action plans too. But Government don’t have to do anything with those ... There’s no specific role for them to respond within a certain time or confirm what they would do. And that has just been copied across into the new system. So, again, when the repository was being created to house all of the previous reports, Government weren’t even sure that they had copies of all the ones that had been sent to them previously, let alone that they’d done anything with them. So, there’s no role for Government. They will send reports out and say, ‘By the way, this has been published’, but they don’t have to provide that response, they don’t have to commit to taking any actions. So, there will be recommendations that are 10 plus years old that have never had that national look or drive and direction.”²³⁰

The police

153. Much of the evidence that we received about multi-agency working centred around the police: how police forces share information and work alongside other

²²⁹ Children, Young People and Education Committee, [21 November 2024, Record of Proceedings](#), paragraphs 96-98

²³⁰ Children, Young People and Education Committee, [21 November 2024, Record of Proceedings](#), paragraph 104

organisations. Policing in Wales highlighted to us multi-agency working across Wales' police forces, including a Missing Children Summit in April 2024, hosted by South Wales Police, and research about the life experiences of children on the brink of criminal exploitation, carried out by Gwent OPCC in 2020 alongside other agencies. Dyfed Powys Police, meanwhile, has a partnership integrated triage trial underway in Pembrokeshire, which aims to prevent and reduce harm and exploitation of children with a more targeted approach to early help across all agencies. There are plans to evaluate and potentially consider the continuation and expansion of this approach more widely across the Dyfed-Powys region.²³¹

154. Other stakeholders agreed that multi-agency meetings involving the police are crucial for maintaining good police-partner working relationships.²³² Bridgend County Borough Council told us about their Exploitation Risk Management Meetings about high risk young people:

“These generally take place fortnightly until situations calms and then decline to once a month to monitor. This is a professionals meeting involving Exploitation and missing police, YOS, drug and alcohol services, connecting families and education and any professional service working with the family.”²³³

155. However, Barnardo's Cymru reported that police officers were rotated too quickly, meaning that they spent relatively short periods within certain teams. They told us that some practitioners felt that this affected their expertise and understanding of the issues facing vulnerable children. They argued that more could be done by the police to boost institutional knowledge and training for officers, citing the Early Action Together programme as an example of good practice.²³⁴

Health bodies

156. Health bodies play a key safeguarding role as part of a multi-agency approach to identifying vulnerable children who may face, or may be at risk of

²³¹ [Letter from Policing in Wales to the Chair of the Children, Young People and Education Committee](#), 23 August 2024

²³² [Written evidence, CYPM22 Paige Monaghan, Dr Sara Waring, Dr Susan Giles \(University of Liverpool\), and Dr Freya O'Brien \(Liverpool John Moores University\)](#)

²³³ [Written evidence, CYPM11 Bridgend County Borough Council](#)

²³⁴ [Written evidence, CYPM21 Barnardo's Cymru](#)

facing, marginalisation. Aneurin Bevan University Health Board set out how they communicate across different agencies:

“In terms of exploitation the health board receives the police cohort for both sexual and criminal exploitation bi-monthly for [Local Authorities in Gwent]... The safeguarding team collate a list of these children which is shared with A&E, CAMHS, sexual health and school health nursing. These services then add the necessary flags to children’s record. For example, if a child on the exploitation cohort attends A&E, then there is a flag on their records to submit a duty to report to children’s services.”

They go on to explain that Clinical Nurse Specialists from CAMHS care seconded into youth offending services, and that there is health board representation on National Referral Mechanism panels alongside police and local authority colleagues.²³⁵

157. We heard from health boards that all children attending sexual health services are asked questions relating to safeguarding, which feeds into a sexual exploitation risk assessment. Referrals to social services are made if a child responds “yes” to certain questions.²³⁶ Aneurin Bevan University Health Board has also promoted a recreational overdose pathway, whereby A&E staff make child protection referrals if certain criteria are met. The team that oversees this process is part of the Gwent Multi Agency Child Exploitation (MACE) meetings, led by Gwent Police. They stress that joint working is key to working successfully to support vulnerable children.²³⁷

158. Cwm Taf Morgannwg University Health Board set out that they have recently made referrals to children’s services under the board’s ‘duty to report’ following a small cohort of young people involved in gangs presenting to their services. They add that Public Protection Nurses based at the Multi-Agency Safeguarding Hub work closely with the police missing persons team and attend multi-agency

²³⁵ [Letter from Aneurin Bevan University Health Board to the Chair of the Children, Young People and Education Committee](#), 9 August 2024

²³⁶ [Letter from Hywel Dda University Health Board to the Chair of the Children, Young People and Education Committee](#), 23 August 2024; [Letter from Cwm Taf Morgannwg University Health Board to the Chair of the Children, Young People and Education Committee](#), 30 August 2024; [Letter from Powys Teaching Health Board to the Chair of the Children, Young People and Education Committee](#), 23 August 2024

²³⁷ [Letter from Aneurin Bevan University Health Board to the Chair of the Children, Young People and Education Committee](#), 9 August 2024

meetings about missing persons and child sexual exploitation.²³⁸ Similarly, Powys Teaching Health Board set out their mechanisms for referrals in line with the Wales Safeguarding Procedures if staff at Minor Injury Units, GPs and out of hours services have concerns about a child's welfare.²³⁹

159. However, health boards' evidence indicates that there are limitations to the systems used to facilitate inter-agency working. Aneurin Bevan University Health Board told us that they have seen a number of presentation with injuries including falls from motorbikes or electric scooters, drug and alcohol misuse and overdoses of prescription medication. However, although these children are known to professionals working with exploited children, there is no evidence that these presentations are directly linked to exploitation as there are no disclosures made.²⁴⁰ Hywel Dda University Health Board wrote that the exact scale and nature of children presenting with injuries that suggest that they may be victims of child criminal exploitation are difficult to quantify, due to the system of coding attendances on the Welsh Patient Administration System.²⁴¹

160. Both Powys Teaching Health Board and Cwm Taf Morgannwg University Health Board called for:

- An equivalent of the sexual exploitation risk assessment for children where there are concerns around criminal exploitation. South Wales Police made similar calls, arguing that risk assessment and subsequent prioritisation of children at-risk from exploitation can be challenging in the context of finite resources and an absence of a pan-Wales exploitation risk assessment tool.²⁴²
- Bespoke training for healthcare professionals around injuries that may be indicative of criminal exploitation (potentially involving the police and other agencies involved in safeguarding to improve multi-agency working).

²³⁸ [Letter from Cwm Taf Morgannwg University Health Board to the Chair of the Children, Young People and Education Committee](#), 30 August 2024

²³⁹ [Letter from Cwm Taf Morgannwg University Health Board to the Chair of the Children, Young People and Education Committee](#), 30 August 2024; [Letter from Powys Teaching Health Board to the Chair of the Children, Young People and Education Committee](#), 23 August 2024

²⁴⁰ [Letter from Aneurin Bevan University Health Board to the Chair of the Children, Young People and Education Committee](#), 9 August 2024

²⁴¹ [Letter from Hywel Dda University Health Board to the Chair of the Children, Young People and Education Committee](#), 23 August 2024

²⁴² [Letter from Policing in Wales to the Chair of the Children, Young People and Education Committee](#), 23 August 2024

In addition, Cwm Taf Morgannwg University Health Board called for:

- Enhanced data collection and reporting by establishing a systematic method for collecting data on children and young people who present with injuries suggestive of child criminal exploitation in emergency departments.²⁴³

161. The Welsh Government's Deputy Director of Social Services Improvement cited the sexual exploitation risk questionnaire and other initiatives – including 'Ask and Act' training to support identification of domestic abuse, sexual violence and gender based violence - as evidence of effective multi-agency working. She also referenced a "strengthening safeguarding review", which will lead to an action plan, which will shortly be sent out for wider consultation.²⁴⁴

Information-sharing

162. The Welsh Government has published guidance about information sharing, including the 'Welsh Accord on Sharing of Personal Information' (WASPI) and the 'Working together to safeguard people: Non-statutory guide on information sharing to safeguard children'. The former is a tool to help participating organisations share personal information effectively and lawfully, which includes an Information Sharing Protocol and a Data Disclosure Agreement.²⁴⁵ The latter is intended as advice for all front line practitioners and managers working with children to make decisions about sharing personal information on a case-by-case basis, where there are safeguarding concerns.²⁴⁶

163. Despite these tools and guidance, a number of organisations highlighted efficient information sharing as a key factor in effective multi-agency working. Some stakeholders called for one single information sharing portal, drawing on inputs from a range of agencies, in a similar vein to Cwm Taf Morgannwg's recommendation above.²⁴⁷ Researchers from the University of Liverpool and Liverpool John Moores University reported that interviewees in policing roles highlight that information-sharing in missing person investigations was affected

²⁴³ [Letter from Powys Teaching Health Board to the Chair of the Children, Young People and Education Committee](#), 23 August 2024; [Letter from Cwm Taf Morgannwg University Health Board to the Chair of the Children, Young People and Education Committee](#), 30 August 2024

²⁴⁴ Children, Young People and Education Committee, [19 September 2024, Record of Proceedings](#), paragraphs 121

²⁴⁵ Welsh Government, ['Wales Accord on the Sharing of Personal Information'](#)

²⁴⁶ Welsh Government, ['Social Services and Well-being \(Wales\) Act 2014: Working Together to Safeguard People. Information sharing to safeguard children. Non-statutory guide for practitioners'](#), July 2019

²⁴⁷ Children, Young People and Education Committee, ['Findings of engagement activities'](#), September 2024, page 10

by technology.²⁴⁸ Action for Children shared similar findings from ongoing research carried out by CASCADE.²⁴⁹ The British Psychological Society reported that:

“... local authorities and health boards continue to face barriers to sharing data on vulnerable children and young people. This disconnect and lack of joined up working raises concerns that vulnerable children are more likely to go unnoticed and could be denied the support they need”.

However, they also urged the Welsh Government to recognise the importance of patient confidentiality as part of its plans to create a Children Missing in Education Database.²⁵⁰

164. We asked the Minister for Children and Social Care whether she believed that GDPR is an obstacle to effective information sharing between statutory and non-statutory partners. The Minister told us that GDPR can pose challenges – for example, in relation to the aforementioned Single Unified Safeguarding Review, which required extensive work with the Information Commissioner’s office. The Welsh Government’s Deputy Director of Social Services Enabling explained:

“It did take time, about six months, to go through that, because it is absolutely an important consideration, particularly when you’re sharing very sensitive data. But we also have to remember that this is often involving child abuse and neglect, and those circumstances, so it is very important that that information is shared... But you’re quite right, it is an important consideration, and it’s very complex... this is a very new field as well, and we had to use some external legal experts to work with us on that because of the complexities. I think the Information Commissioner’s Office was very grateful for that.”²⁵¹

Information sharing case study from West Glamorgan Safeguarding Board: the Multi Agency Safeguarding Tracker (MAST)

²⁴⁸ [Written evidence, CYPM22 Paige Monaghan, Dr Sara Waring, Dr Susan Giles \(University of Liverpool\), and Dr Freya O'Brien \(Liverpool John Moores University\)](#)

²⁴⁹ [Written evidence, CYPM25B Action for Children](#)

²⁵⁰ [Written evidence, CYPM29 British Psychological Society \(BPS\)](#)

²⁵¹ Children, Young People and Education Committee, [19 September 2024, Record of Proceedings](#), paragraphs 132-136

MAST is a cloud-based digital information sharing solution. It was originally funded by NHS England, the Local Government Association and core safeguarding partners from across the West Midlands, as part of the Social Care Digital Innovation Accelerator 2020/21.

The tracker allows partners with mandatory responsibility for safeguarding to securely share headline data, underpinned by a documented information governance structure. The platform gives immediate, real time access to safeguarding activity across the last 12 months (automatically updated daily) - searchable by both person and address.

MAST's technical partners, Policy in Practice, explain:

“MAST is a digital tool that allows social workers to easily see whether other safeguarding agencies are actively involved with a person or address. This information will support their professional judgement, and make it easier to have conversations with practitioners from other services. This means that social workers can better support vulnerable people.”

West Glamorgan Safeguarding Board engaged with the MAST team in 2021 to undertake a pilot ('proof of concept') for a MAST to operate across Neath Port Talbot Council, Swansea City Council, South Wales Police and Swansea Bay UHB. Over 400,000 records were shared as part of the pilot. Key insights of the pilot include:

- Ability to search through individuals and addresses to see trends in the data, and see cases transition from children to adult services.
- Individuals identified with interactions with children's/healthcare services and with the police, who had not been previously identified.
- The identification of care leavers who were or who had been in custody.
- Evidence of individuals with high contact with the Health Service (A&E and DNAs), including 93 individuals with between 16-25 interactions with the NHS over the last year alone.

Following the successful proof of concept, the West Glamorgan Safeguarding Board are in the final stages of a full roll-out of the West Glamorgan MAST. In documentation shared with the Committee, the West Glamorgan MAST team

calls for a Wales-wide MAST to improve information sharing among agencies with safeguarding responsibilities across the country.²⁵²

Early intervention & preventative services

The benefits of early intervention

165. Time and time again, we heard professionals and academics argue in favour of early intervention and preventative services to protect vulnerable children on the margins.

166. Both Gwent Police and North Wales Police set out their early intervention projects to support their response to CCE, with the latter stressing that prevention will underpin future work to support children and young people.²⁵³ Another statutory professional told us about their reviews of case files for exploited children were akin to “looking at a car crash in slow motion”. They stressed to us that the risk factors are clear to see from the outset, but that without early intervention the inevitable happens.²⁵⁴ The Association of School and College Leaders Cymru agreed, telling us that, without early intervention or support, “young people can become dragged into criminal activity”.²⁵⁵ The Jay Review summarised the positive impact of early interventions:

“We heard evidence on the range of early interventions and ways of working with children and families that had been shown to be successful. This included ensuring that parents are seen as a protective factor and that interventions are child-centred, trauma-informed and work with the family as a whole, including being aware of contextual factors such as ethnicity, poverty, unstable housing or employment and mental ill-health.”²⁵⁶

167. The British Psychological Society argued that the thresholds for requiring support services are very high, which means that cases will already have escalated

²⁵² [Written evidence, CYPM Additional information West Glamorgan Safeguarding Partnership; Co-Fund & Collaborate to Innovate, ‘Multi Agency Safeguarding Tracker’; Policy in Practice, ‘Welcome to the Multi Agency Safeguarding Tracker’](#)

²⁵³ [Letter from Policing in Wales to the Chair of the Children, Young People and Education Committee](#), 23 August 2024

²⁵⁴ Children, Young People and Education Committee, [‘Findings of stakeholder events’](#), September 2024, page 14

²⁵⁵ [Written evidence, CYPM12 Association of School and College Leaders Cymru](#)

²⁵⁶ Jay, A. et al, [‘Shattered lives, stolen futures. The Jay Review of Criminally Exploited Children’](#), March 2024, page 63

considerably when they meet the threshold for support. They advocated early intervention to ensure that vulnerable children are less likely to need ongoing support.²⁵⁷ Some of the stakeholders we spoke to aired similar views, arguing that fixed thresholds for interventions should not always be the basis for taking action. Intervening early, picking up on early signs such as anti-social behaviour in the community, should tip the focus away from reactive work towards early intervention.²⁵⁸

168. A number of stakeholders, including RAY Ceredigion, stressed the value of community-based youth work, which Welsh Women’s Aid stressed is “key to early intervention and prevention”.²⁵⁹

169. Some professionals stressed to us the importance of working with the whole family, and even the wider community, to denormalise criminal activity. We heard that many parents who have children involved in criminal activity didn’t even know that their children are at risk.²⁶⁰ Others explained that some families are afraid to engage with statutory services (such as to report their child as missing, or that they are involved in criminal activity) because they are afraid that the child will be taken into care. Some called for more investment in parental advocacy to give a voice to parents who have social services involvement. Others strongly advocated Family Group Conferencing as a cultural shift towards family-centred working.²⁶¹

170. During questioning, the Cabinet Secretary stressed to us the importance of prevention work as a key component of the Youth Justice Blueprint for Wales. She highlighted the Bwlch project in Carmarthenshire, a youth support service that brings together youth work and youth justice staff, as a positive example of multi-agency working to deliver a “single, joined-up approach” focusing on prevention.²⁶²

²⁵⁷ [Written evidence, CYPM29 British Psychological Society \(BPS\)](#)

²⁵⁸ Children, Young People and Education Committee, [‘Findings of stakeholder events’](#), September 2024, page 14

²⁵⁹ [Written evidence, CYPM3 RAY Ceredigion: Written evidence, CYPM27 Welsh Women’s Aid](#). See also: [Written evidence, CYPM26 Welsh Local Government Association](#)

²⁶⁰ Children, Young People and Education Committee, [‘Findings of stakeholder events’](#), September 2024, page 11

²⁶¹ Children, Young People and Education Committee, [‘Findings of engagement activities’](#), September 2024, pages 4 and 8

²⁶² Children, Young People and Education Committee, [19 September 2024, Record of Proceedings](#), paragraphs 70-72

Case study: Newport's Rapid Response (Newport City Council & Barnardo's Cymru)

The Rapid Response service was launched in September 2020. It is one of several teams that fall under the umbrella of Newport Family Support Service, which is a strategic partnership between Newport City Council and Barnardo's Cymru.

Rapid Response aims to deliver evidence based, trauma informed interventions of up to 6 weeks. The Rapid Response team takes referrals where a family is at risk of breakdown. Following consultation with the referring social workers, all referrals into the service will be allocated immediately with contact being made with families within 24 hours from point of allocation. The team offer support to the family to help stabilise the situation and, wherever possible, remain safely together. A support pathway is developed for the family during the 6-week intervention to promote their engagement, with community and family support to empower them to identify and safely meet their own needs in the future. If additional needs are identified, then families open to the service will be allocated to either a Family Support or Therapeutic Team for ongoing support.

Rapid Response is a small project with 3 family support workers alongside the Newport City Council Safeguarding Hub to respond immediately to family need. Workers provide immediate, intensive intervention that is provided to families at immediate risk of breakdown. Without this support, the young person would most likely come into care.

Rapid response has worked with 205 young people since September 2020:

- In 93% (n. = 180) of these cases the young person remained at home with their family.
- 93% of these young people have remained out of care for a minimum of 6 months.
- 18 of these young people were supported to be looked after by the LA.
- Only 7 young people refused to engage with the service.
- 100% would recommend Rapid Response to other families experiencing similar difficulties.

Schools as sites for early intervention

171. We received a significant body of evidence about both the benefits of early intervention in schools (discussed here), and the risk factors associated with not attending school (discussed under ‘Risk factors for marginalisation’ later in this report). The British Psychological Society wrote that teachers and support staff play a key role in providing children with stability.²⁶³ The Welsh Local Government Association (WLGA) submitted similar views, stressing the crucial role that schools place in identifying children at risk of disengaging.²⁶⁴ Bridgend County Borough Council suggested that a programme of early intervention should start in Year 6, and also reported that parents have requested sessions with schools to learn more about exploitation and to provide support to each other.²⁶⁵

172. However, we also heard concerns that schools don’t always have the capacity and/or skills to deliver such specialist support. The Association of Directors of Education reported concern amongst schools about a shortfall in resources and capacity to support vulnerable learners. They point to challenges in retaining quality pastoral teaching assistant support, which it argues can severely impact schools’ response to at-risk pupils.²⁶⁶ The British Psychological Society raised similar concerns, noting schools are overstretched, and consequently may struggle to adopt more “relational” rather than “behavioural” approaches.²⁶⁷ Some professionals told us that, in their experience, involving school staff can even have negative unintended consequences. For example, one frontline professional explained that a school may exclude a child who they suspect is involved in drug dealing, which can lead to family breakdown, making the problem worse.²⁶⁸

173. Our Citizen Engagement Team heard that the effectiveness of intervention depends on the approach taken by the school and individual teachers. They noted that schools vary widely in their level of commitment to supporting at-risk students. In some cases, schools quickly pass concerns onto authorities, which can create a sense of fear and mistrust among students. They called for school staff to be trained to recognise and respond effectively to signs of exploitation, enabling timely and appropriate interventions. As one participant put it:

²⁶³ [Written evidence, CYPM29 British Psychological Society \(BPS\)](#)

²⁶⁴ [Written evidence, CYPM26 Welsh Local Government Association](#)

²⁶⁵ [Written evidence, CYPM11 Bridgend County Borough Council](#)

²⁶⁶ [Letter from the Association of Directors of Education in Wales to the Chair of the Children, Young People and Education Committee](#), 23 August 2024

²⁶⁷ [Written evidence, CYPM29 British Psychological Society \(BPS\)](#)

²⁶⁸ Children, Young People and Education Committee, [‘Findings of stakeholder events’](#), September 2024, page 20

“It all comes down to the teacher... You need the right kind of teacher, not just anyone who’s been hired, you need a special team.”²⁶⁹

174. The Association of Directors of Education called for funding for schools specifically to support children who may be at risk of becoming marginalised and vulnerable to child criminal exploitation.²⁷⁰ Similarly, both Bridgend County Borough Council and the WLGA also stressed that teaching and non-teaching staff need appropriate ongoing training, including by specialist organisations as and when appropriate.²⁷¹

175. Others argued that preventative interventions could take place in schools, but could be delivered by external agencies. For example, CASCADE reported that young people with experience of exploitation had called for youth workers to be based in schools, a view shared by some of the stakeholders we spoke to.²⁷² Gwent Police wrote that they commissioned Crime Stoppers Fearless to carry out workshops with children at school and youth groups.²⁷³

176. Dyfed-Powys Police, meanwhile, highlighted the All-Wales School Police Programme, which led to the police force being active in 318 schools across its area. The force has invested in specially trained school-based officers who provide schools, children and young people with up-to-date information about a range of topics including county lines and exploitation.²⁷⁴ However, Barnardo’s Cymru raised concern that the Wales Police Schools Programme is coming to an end in 2024, following cuts in Welsh Government’s 2024/2025 budget. They described the programme as “vital for helping children understand the role of the police, getting to know local officers and building relationships, and undertaking early intervention and prevention work.”²⁷⁵

²⁶⁹ Citizen Engagement Team, ‘[Children and young people on the margins: Engagement findings](#)’, October 2024, pages 8-9

²⁷⁰ [Letter from the Association of Directors of Education in Wales to the Chair of the Children, Young People and Education Committee](#), 23 August 2024

²⁷¹ [Written evidence, CYPM11 Bridgend County Borough Council](#); [Written evidence, CYPM26 Welsh Local Government Association](#)

²⁷² [Written evidence, CYPM11 Bridgend County Borough Council](#); [Written evidence, CYPM13 CASCADE, Cardiff University](#); Children, Young People and Education Committee, ‘[Findings of engagement activities](#)’, September 2024, page 8

²⁷³ [Letter from Policing in Wales to the Chair of the Children, Young People and Education Committee](#), 23 August 2024

²⁷⁴ [Letter from Policing in Wales to the Chair of the Children, Young People and Education Committee](#), 23 August 2024

²⁷⁵ [Written evidence, CYPM21 Barnardo’s Cymru](#)

Social services

Workforce issues

177. The most frequently raised concerns during our inquiry into radical reform of services for care experienced children and young people were about the social care workforce.²⁷⁶ Here, once again, a range of different stakeholders highlighted the implications of strains on children’s social care teams for how they are able to work with marginalised children and young people.

178. Concerns about the recruitment and retention of social workers are amongst the clearest themes across our evidence gathering. Welsh Women’s Aid called the challenges facing specialist services’ recruitment and retention “an acute crisis.”²⁷⁷ Barnardo’s Cymru said that challenges with social care recruitment and retention mean that it is incredibly difficult to ensure that children have access to the same worker to build a trusting relationship. They, too, concluded that the social work sector is “in crisis”, and urged the Welsh Government to prioritise investing to ensure that social work is an attractive career option.²⁷⁸ The Association of School and College Leaders Cymru argued that the rate of change of care workers and social workers was impacting the vulnerability of the children they work with²⁷⁹, and numerous stakeholders during our engagement activities expressed concern about the impact of agency workers and the high turnaround of social care staff²⁸⁰. Other stakeholders made the link between what they saw as the vilification of social workers in the media and the recruitment and retention challenges facing the social care workforce.²⁸¹

179. Some stakeholders raised concerns about the impact of social workers’ caseloads on their work with vulnerable children. The Children’s Legal Centre Wales argued that social worker caseloads are too high to effectively support these care experienced children at risk of criminal exploitation.²⁸² Barnardo’s linked high caseloads with the recruitment and retention challenges faced by the sector, as noted above, and argued that these “entrenched” issues should be

²⁷⁶ Children, Young People and Education Committee, [‘If not now, then when? Radical reform for care experienced children and young people’](#), May 2023, pages 25-38

²⁷⁷ [Written evidence, CYPM27 Welsh Women’s Aid](#)

²⁷⁸ [Written evidence, CYPM21 Barnardo’s Cymru](#)

²⁷⁹ [Written evidence, CYPM12 Association of School and College Leaders Cymru](#)

²⁸⁰ Children, Young People and Education Committee, [‘Findings of stakeholder events’](#), September 2024, pages 15-16

²⁸¹ Children, Young People and Education Committee, [‘Findings of engagement activities’](#), September 2024, page 8

²⁸² [Written evidence, CYPM30 Children’s Legal Centre Wales](#)

tackled to improve outcomes for staff, children and their families.²⁸³ During our engagement events, we heard that social services don't tend to have the capacity to support older teenagers, and that social workers' time is focussed on younger children. One professional felt that older teenagers can get written off, telling us that when they reach 18 they face a cliff edge of support, and "the most vulnerable get the worst deal".²⁸⁴

180. The Welsh Local Government Association's evidence summarised the challenges that children's social care services are facing:

*"Given the extremely challenging public sector funding situation, services and the work-force delivering services are coming under increasing strain, with less money at the same time as ever increasing demand. As well as a reduction in capacity across services, there is a recruitment and retention crisis compounding an already challenging scenario. All of these factors impact on the ability of local government services to effectively engage with children, young people and their families/carers to either avoid them finding themselves on the margins of services and/or when they find themselves in difficult circumstances, carrying out the intensive work necessary to overcome barriers to accessing even basic provision."*²⁸⁵

181. One professional told us that some social work teams embraced the model of a 'resilient social worker', which they described as a social worker who should expect to be able to absorb the tragedy, abuse and pain that they experience in the jobs, without ongoing professional support and therapy to help them manage those emotions. We heard that it is essential that social services staff support one-another, and raise concerns about stress or anxiety about themselves or their colleagues if necessary.²⁸⁶

182. We heard different views about how social services should respond to and support marginalised children and their families. Some stakeholders felt that there should be specialised teams of social workers to work with the most vulnerable and high-risk children and their families; others strongly disagreed, saying that all staff should be supported to have those skills. We heard calls for

²⁸³ [Written evidence, CYPM21 Barnardo's Cymru](#)

²⁸⁴ Children, Young People and Education Committee, '[Findings of stakeholder events](#)', September 2024, page 15

²⁸⁵ [Written evidence, CYPM26 Welsh Local Government Association](#)

²⁸⁶ Children, Young People and Education Committee, '[Findings of engagement activities](#)', September 2024, page 8

social workers to focus on their statutory duties, and for third-sector charity workers to lead on relationship-focused work. Some groups of charity professionals advocated more of a partnership approach, whereby social workers work alongside more specialist charity workers, whose roles involve engaging more informally with children and their families. Others argued that social workers should be assigned to families as a whole, rather than to specific young people, explaining that if the young person goes missing, the family will often be left without support.²⁸⁷ However, there was a strong consensus that the most experienced and knowledgeable staff should be working with the most vulnerable and marginalised children, and that social workers should be supported to develop the right social skills to work with at-risk children.²⁸⁸

183. The young people with lived experience of criminalisation who spoke to our Citizen Engagement Team shared significant concerns about the effectiveness of social services support systems for vulnerable young people. Some described experiences of neglect or inadequate support from social services, and felt that social workers were more focused on fulfilling bureaucratic obligations than on offering meaningful assistance. They conveyed a sense of distrust towards social services, describing how unreliable or absent support worsened their circumstances. Young people and parents alike expressed frustration with what they felt were tokenistic or short-term interventions. We heard that building trust with vulnerable families is a gradual process requiring sustained commitment, and they argued that a lack of consistent, compassionate support can leave families feeling abandoned and reluctant to engage with these services. We heard calls for social services to have a more proactive role in supporting families, and for social services to focus on trust-based, sustained support rather than short-term interventions:

“It’s not enough to just try to help a kid for a few weeks and then move on. You’ve got to put in the time to understand what’s going on in their lives. Building that trust doesn’t happen overnight.”²⁸⁹

184. We asked the Minister for Children and Social Care for her assessment of the capacity of the social care workforce, recognising the challenges faced by high

²⁸⁷ Children, Young People and Education Committee, [‘Findings of stakeholder events’](#), September 2024, page 16

²⁸⁸ Children, Young People and Education Committee, [‘Findings of stakeholder events’](#), September 2024, page 15; Children, Young People and Education Committee, [‘Findings of engagement activities’](#), September 2024, page 8

²⁸⁹ Citizen Engagement Team, [‘Children and young people on the margins: Engagement findings’](#), October 2024, pages 10-11

case loads, staff turnover and other related issues. The Minister stressed that she is “particularly concerned and exercised” about the social care workforce. She pointed to Welsh Government interventions to bolster the social care workforce, including the social work bursary and social care career pathways. The Minister and her officials noted that, since the introduction of the bursary, there has been an increase in the cohort of social workers going through training (665 students as of September 2024, including traditional students, those accessing the social worker bursary and local authority ‘grow your own’ scheme, as well as open university courses²⁹⁰). However, they acknowledged that this cohort will take time to complete their training and take up social work jobs.²⁹¹

185. We also asked the Minister about the value, or otherwise, of specialist social workers to work alongside criminally exploited children. The Minister indicated that the sector has seen a shift away from specialist practitioners. However, the Welsh Government’s Deputy Director of Social Services Improvement did confirm that some areas with high levels of child sexual exploitation and missing children reports have developed bespoke teams of practitioners who have received more specialist training in those areas.²⁹²

Contextual safeguarding

186. Some of the evidence we received advocates that social services move away from a family-focused safeguarding model towards contextual safeguarding, particularly when working with older children. As Firmin and Knowles explain, contextual safeguarding involves:

“using techniques to explore how different contexts impact/influence each other when assessing the needs of young people, their families and extra-familial spaces... In terms of families, a critical element of this work is assessing the relationship between the extra-familial contexts and the influence/capacity of a parent to care for, and protect, their

²⁹⁰ [Letter from the Cabinet Secretary for Social Justice, Trefnydd and Chief Whip and the Minister for Children and Social Care to the Chair of the Children, Young People and Education Committee](#), 9 October 2024

²⁹¹ Children, Young People and Education Committee, [19 September 2024, Record of Proceedings](#), paragraphs 91-93

²⁹² Children, Young People and Education Committee, [19 September 2024, Record of Proceedings](#), paragraphs 137-145

*child. And further to this – the extent to which factors within the family home exacerbate issues external to the family home.*²⁹³

The Jay Review argues that “Family-focused services are not always appropriate or able to support children who are exploited outside their homes.”²⁹⁴ Some of our stakeholders agreed, urging social services to identify areas and communities that are at risk and how that risk can be addressed in a holistic way.

187. We learnt that there are already initiatives focusing on extra-family harm in Wales. The Association of Directors of Education in Wales explained that one local authority’s child and family services has formed a Contextual, Missing, Exploited, Trafficked (CMET) team who support children and young people in contextual situations. CMET is an operational forum which recognises “the important role that communities and partner agencies have in creating safe places and spaces for the authority’s children and young people to spend time by taking a more contextual approach to safeguarding.” This work is often undertaken in schools.²⁹⁵

188. However, during our stakeholder events, one professional expressed concern that contextual safeguarding can create workload, and actually make it harder for social workers and other practitioners to develop relationships with the child and their family.²⁹⁶

The role of the third sector

189. During our stakeholder and engagement events, we heard a lot about how the third sector is supporting statutory services to help vulnerable children. Some felt that charities were “leading the way”, while one stakeholder told us bluntly that social services would collapse under the pressure if the charity sector’s support were withdrawn.²⁹⁷

190. Others explained that it is independent workers, like youth workers, who have the skills to deal with groups of marginalised young people on the streets, supporting them face-to-face. One stakeholder felt that, fundamentally, a lot of

²⁹³ Firmin, C. & Knowles, R., ‘[The legal and policy framework for Contextual Safeguarding approaches: A 2020 update on the 2018 legal briefing](#)’, October 2020, page 7

²⁹⁴ Jay, A. et al, ‘[Shattered lives, stolen futures. The Jay Review of Criminally Exploited Children](#)’, March 2024, page 55

²⁹⁵ [Letter from the Association of Directors of Education in Wales to the Chair of the Children, Young People and Education Committee](#), 23 August 2024

²⁹⁶ Children, Young People and Education Committee, ‘[Findings of stakeholder events](#)’, September 2024, page 17;

²⁹⁷ Children, Young People and Education Committee, ‘[Findings of stakeholder events](#)’, September 2024, page 15

the work that skilled charity workers carry out is rooted in child and family advocacy. We heard frequently from third sector professionals that children caught up in criminal activity often don't trust statutory professionals, and that the charity sector is often able to build more positive relationships with vulnerable children than professionals working for statutory agencies.²⁹⁸

191. Others, however, pointed out that many support services do not provide long-term support for children, which is an important factor when building trust. It was clear from the frontline third sector staff we spoke to that they had significant experience and skills in working with very vulnerable young people in difficult situations. However we also heard from third-sector professionals themselves that not all staff will have the experience of working in such high-risk settings.²⁹⁹ We heard that some charity staff learn a lot about the gangs that exploit the young people they work with, which places them at risk. Some even reported charity staff being followed by exploiters.³⁰⁰

192. We heard concern that services which were seen to be essential to supporting children at risk of criminal exploitation – whether provided by the non-statutory or statutory sector – do not exist, or are under-resourced.³⁰¹ The Association of School and College Leaders Cymru argued that there is a lack of resources in the system to support and intervene, and that early intervention “is virtually non-existent”³⁰² (we discuss early intervention in more detail below). The Children's Society submitted similar evidence, arguing that family support services for children at risk of exploitation/extra-family harm are lacking in many areas of Wales.³⁰³ St Giles Trust agreed, arguing that funding for support for county lines activity has gone to export areas (London, Birmingham), rather than smaller towns and villages where the impacts can be felt most acutely.³⁰⁴

193. Barnardo's Cymru reported that children at risk of exploitation can remain on waiting lists for services, which they argued is unacceptable given the immediate risk of abuse or exploitation that the child is facing.³⁰⁵ CASCADE told us that the

²⁹⁸ Children, Young People and Education Committee, '[Findings of engagement activities](#)', September 2024, page 7; Children, Young People and Education Committee, '[Findings of stakeholder events](#)', September 2024, page 15

²⁹⁹ Children, Young People and Education Committee, '[Findings of stakeholder events](#)', September 2024, pages 10-11, 15

³⁰⁰ Children, Young People and Education Committee, '[Findings of stakeholder events](#)', September 2024, page 16

³⁰¹ Children, Young People and Education Committee, '[Findings of engagement activities](#)', September 2024, page 6

³⁰² [Written evidence. CYPM12 Association of School and College Leaders Cymru](#)

³⁰³ [Written evidence. CYPM18 The Children's Society](#)

³⁰⁴ [Written evidence. CYPM19 St Giles Trust](#)

³⁰⁵ [Written evidence. CYPM21 Barnardo's Cymru](#)

fluctuating levels of risk associated with CCE may mean that a child fails to reach the required threshold for some interventions.³⁰⁶

194. We asked the Minister for Children and Social Care whether she felt that the third sector should take the lead on relationship building, leaving the statutory agencies to perform their statutory duties. The Minister recognised the “amazing” work that third sector organisations do. However, she argued that there is a role for both statutory and non-statutory practitioners to fulfil a pastoral role. She argued that children should always have the choice of whom they speak to about non-statutory issues – including their social worker if they prefer. The Minister also raised concerns that social work practice may become too “regimented” if it focuses entirely on statutory work at the expense of advocacy and pastoral support.³⁰⁷

Funding

195. The Jay Review found that the “lack of consistency of funding – both for core services and for programmes that specifically tackle child exploitation – is a barrier to sustainable outcomes and prevents a focus on prevention or early intervention.”³⁰⁸ Similar concerns about funding were consistently raised with us from professionals working across both the statutory and charity sectors, including the Welsh Local Government Association.³⁰⁹ Barnardo’s Cymru in particular argued that “Budget cuts mean that local authorities struggle to invest in non-statutory services which children, young people and families would rely on in the prevention space.”³¹⁰

196. The British Psychological Society observed that when children and young people go missing, police, local authorities, health services, and schools are often all involved in a single case. However, budgetary challenges can impact on the continuity of care those statutory agencies are able to provide.³¹¹ Researchers from the University of Liverpool and Liverpool John Moores University submitted similar evidence from their UK-wide research into multi-agency responses to missing

³⁰⁶ [Written evidence, CYPM13 CASCADE, Cardiff University](#)

³⁰⁷ Children, Young People and Education Committee, [19 September 2024, Record of Proceedings](#), paragraph 169

³⁰⁸ Jay, A. et al, [‘Shattered lives, stolen futures. The Jay Review of Criminally Exploited Children’](#), March 2024, page 64

³⁰⁹ Children, Young People and Education Committee, [‘Findings of stakeholder events’](#), September 2024, page 17; [Written evidence, CYPM26 Welsh Local Government Association](#); Children, Young People and Education Committee, [‘Findings of engagement activities’](#), September 2024, page 10

³¹⁰ [Written evidence, CYPM21 Barnardo’s Cymru](#)

³¹¹ [Written evidence, CYPM29 British Psychological Society \(BPS\)](#)

children investigations, finding that a key barrier to inter-team working was the level of demand being placed on finite resources.³¹²

197. We heard that police forces are not immune to funding challenges, either. Dyfed-Powys Police reported that its service demands are growing and becoming increasingly complex, with year-on-year increases in recorded crime, including incidents involving mental ill-health and complex inquiries into child sexual exploitation and cybercrime.³¹³

198. For the charity sector, we heard that funding constraints mean fewer preventative services and shorter funding guarantees. Action for Children called for:

“A clear funding pathway that is long term and sustainable. Current funding is short term, fragmented and often does not focus on exploitation given the challenges with quantifying, defining and responding to the issue. Without a clear focus on exploitation and our response funding will not be prioritised.”³¹⁴

199. The Children’s Legal Centre Wales and the Welsh Local Government Association agreed that the Welsh Government and others should properly fund an effective diversion and prevention agenda.³¹⁵ St Giles Trust argued that while some services effectively support vulnerable young people, “funding constraints mean those projects are not always able to meet the needs of the number of young people who would benefit from that support”. They go on:

“Funding is often awarded for only 1 year which severely limits how effective projects are, given the length of time required for finding and training caseworkers, and how long it takes to build trusting relationships with young people.”³¹⁶

Others shared similar views.³¹⁷

³¹² [Written evidence, CYPM22 Paige Monaghan, Dr Sara Waring, Dr Susan Giles \(University of Liverpool\), and Dr Freya O'Brien \(Liverpool John Moores University\)](#)

³¹³ [Letter from Policing in Wales to the Chair of the Children, Young People and Education Committee](#), 23 August 2024

³¹⁴ [Written evidence, CYPM25B Action for Children](#)

³¹⁵ [Written evidence, CYPM30 Children’s Legal Centre Wales; Written evidence, CYPM26 Welsh Local Government Association](#)

³¹⁶ [Written evidence, CYPM19 St Giles Trust](#)

³¹⁷ Children, Young People and Education Committee, ‘[Findings of engagement activities](#)’, September 2024, page 7

200. A number of stakeholders argued passionately for investment in youth work to work with vulnerable children. This often went side-by-side with calls for more physical spaces for youth work to be carried out. One stakeholder lamented the closure of youth centres in particular, telling us that “We were being asked to prove the value of our youth work, and we couldn’t. But we know when it’s gone.”³¹⁸ Others strongly agreed: Welsh Women’s Aid reported that “the erosion of youth clubs and other broader support within communities undermines access to support and a safe place”.³¹⁹ The Welsh Local Government Association made the point particularly powerfully:

“With its non-formal education approach, youth work plays a crucial and valued role in supporting young people from all backgrounds and abilities. Youth workers are particularly skilled at engaging with young people aged 11-25, many of whom are reluctant to engage with other services. This is often due to the voluntary nature of the relationship, where the ‘power’ rests with the young person. Youth work takes place in a variety of settings including on the streets, in youth clubs, schools and hospitals.”³²⁰

201. In another symptom of funding challenges, some stakeholders raised concern about low pay amongst charity workers working with marginalised children, arguing that you can earn more working in a supermarket than working with a child at risk of criminalisation.³²¹

Our view

Multi-agency working

The Single Unified Safeguarding Review (SUSR)

202. The Welsh Government is clearly pinning a considerable amount of hope on its new Single Unified Safeguarding Review (SUSR) process in its efforts to improve multi-agency child protection. We welcome any attempts to bring

³¹⁸ Children, Young People and Education Committee, [‘Findings of stakeholder events’](#), September 2024, page 17

³¹⁹ [Written evidence, CYPM27 Welsh Women’s Aid](#)

³²⁰ [Written evidence, CYPM26 Welsh Local Government Association](#)

³²¹ Children, Young People and Education Committee, [‘Findings of stakeholder events’](#), September 2024, page 16

agencies together constructively to ensure that lessons are learnt when things go wrong to stop them happening again.

203. However, we are concerned about the governance of the SUSR process. For the reviews to deliver real Wales-wide change – and we are very hopeful that they will – the recommendations made during the SUSR must be rolled out swiftly to individual agencies across the whole of Wales to implement. In turn, those agencies must be held to account for doing so.

204. The Welsh Government assures us that the Wales Safeguarding Repository will hold all SUSR reports and recommendations, and that the SUSR co-ordination hub within Welsh Government will – in partnership with the national and regional safeguarding boards – both disseminate recommendations from individual reports across Wales and ensure that they are being implemented. Based on the evidence we heard from the Children’s Commissioner’s Office we are not confident that this will actually happen.

205. The local and national safeguarding boards have a clear role to play here. But there must be a responsible enforcing body to oversee the implementation of SUSR recommendations across agencies, and that body must have real teeth to take action if required. Efficient information sharing and strong accountability should be at the heart of the SUSR process.

Recommendation 8. The Welsh Government should review the Single Unified Safeguarding Review governance arrangements to ensure that the process:

- includes a clear, efficient and transparent mechanism by which report recommendations are immediately disseminated to every single relevant individual agency across the whole of Wales to implement;
- clearly states whose responsibility it is to make sure that each relevant individual agency is made aware of what they need to do to implement the recommendations;
- clearly states whose responsibility it is to make sure that recommendation *is* implemented; and
- clearly states what enforcement action will be taken if recommendations are not implemented, who will take that enforcement action, and when and how it will be taken.

The safeguarding boards

206. In Wales we have statutory forums for multi-agency working to safeguard children: the national and regional safeguarding boards. As we have heard, these boards have a critical role to play in the immediate and long-term response to children who go missing and children who are criminally exploited. They are also central to the Welsh Government's new Single Unified Safeguarding Review process, as discussed above.

207. So we were deeply concerned when stakeholders suggested to us that the safeguarding boards are not meeting as often as they should, and that they may be resisting taking ownership of CCE. We asked the Welsh Government twice – once orally, once in writing – for information about how often the national and regional safeguarding boards *actually* meet (not how often they are *supposed* to meet). We are none the wiser. This information should be made public at the earliest opportunity.

Recommendation 9. For each of the six Regional Safeguarding Boards and the National Independent Safeguarding Board, the Welsh Government should publish for the 2023-24 financial year:

- actual meeting dates;
- records of which agencies/organisations attended each meeting; and
- meeting agendas and minutes, including actions agreed (redacted as appropriate).

208. However, we are conscious that holding meetings in and of itself does not necessarily translate to meaningful action. Whilst we appreciate the need for strategic oversight of critical and complex issues such as those explored in this report, our primary concern must always be how that strategic oversight leads to better outcomes. We therefore ask the Welsh Government to set out its assessment of the extent to which the safeguarding boards are driving improvement in safeguarding practice.

Recommendation 10. In its response to this report, the Welsh Government should set out its assessment of the effectiveness of the six Regional Safeguarding Boards and the National Independent Safeguarding Board in bring together local and national partners across statutory and non-statutory agencies, devolved and otherwise, to deliver tangible improvements in safeguarding practice.

209. Of course, the responsibility for safeguarding children is not limited to safeguarding boards. It is abundantly clear that we need an effective multi-agency response approach to marginalised children that is hard-wired into the day-to-day working practice of a range of statutory and non-statutory agencies. When we are talking about incredibly complex matters such as those explored in this report, which inevitably involve professionals across a diverse range of agencies – some of which that cross the devolution threshold – that multi-agency response must be flexible enough to be able to meet to the specific needs of each child. The subsequent recommendations in this section aim to improve that multi-agency response by improving the following:

1. Staff awareness and training, which underpins individual professionals' responses to vulnerable children
2. Systems and procedures, which enable agencies to share concerns with, and draw on the expertise of, other relevant agencies to build a more complete picture of the child's needs

Staff awareness and training

210. Firstly: we think that Wales needs a 'no wrong door' approach to safeguarding marginalised children. The needs of the children we discuss in this report will share common themes, but their individual needs and the response required to safeguard them are unique. The first sign that a child is being abused or exploited might be that they go missing. It might be that they suddenly have expensive new clothes. It might be that they regularly present to accident and emergency departments with a specific type of injury. Or it might be that they get in trouble with the police for anti-social behaviour. It is impossible to know who the first professional with an opportunity to spot those early warning signs will be, or who the child might feel safe enough with to disclose vital early indicators of abuse.

211. The trouble is, if that professional does not understand the very specific indicators of criminal exploitation they may not make that critical child protection referral. Or if they do have concerns, they might not know what the right response should be. With the best of intentions, they could even inadvertently place the child in even more danger.

212. We note the feedback of professionals across agencies who have told us that, when compared to child sexual exploitation, frontline professionals' understanding of child criminal exploitation is inconsistent. Youth workers,

teachers, the police, mental health practitioners and healthcare staff will all be on the frontline of interactions with criminally exploited children, without necessarily realising the nature of the exploitation the child is experiencing. This is hampering the multi-agency response to exploited children.

213. To improve our collective national response, we believe that the Welsh Government – drawing on existing work such as Cardiff University’s Complex Safeguarding Wales Practitioner Toolkit and expertise across the statutory and charity sector – should develop a set of resources and training materials aimed at professionals across agencies that work with vulnerable children who are at risk of criminal exploitation.

Recommendation 11. The Welsh Government should work alongside statutory and non-statutory partners, drawing on existing work such as Cardiff University’s Complex Safeguarding Wales Practitioner Toolkit, to develop a set of resources and training materials to improve frontline professionals’ awareness of, and response to, criminal exploitation and the other forms of marginalisation explored in this report. These resources and materials should be targeted at professionals working in a range of settings that have direct contact with vulnerable children (such as social services, housing departments, education establishments, health boards, etc.). The Welsh Government should take steps to ensure that relevant frontline professionals across the statutory sector – including those employed by organisations commissioned by the statutory sector, such as charities – receive that training.

Systems and procedures for information sharing

214. We are grateful for the comprehensive responses we received from health boards and police forces across Wales to our requests for evidence about their multi-agency safeguarding role. We have considered their calls (and the calls of others) for a child criminal exploitation risk assessment tool to help professionals working in healthcare settings to identify the signs of criminal exploitation. We also note that a key finding of the West Glamorgan’s Multi Agency Safeguarding Tracker (discussed above and below) was that it was able to identify individuals with repeated contacts with the health service. Presumably, these individuals would not necessarily have been identified *without* the tracker, which suggests to us that a beneficial step in safeguarding reporting processes may be missing.

215. Based on the expert views of the health boards, South Wales Police and others, we support the development of a pan-Wales exploitation risk assessment tool for criminally exploited children to address that reporting gap. We believe

that this tool should be developed alongside along key statutory and non-statutory agencies. It should be rolled out to professionals alongside the package of training and awareness-raising materials that we advocate in Recommendation 11 to meet the accompanying calls from health boards for better training for frontline healthcare staff.

Recommendation 12. The Welsh Government should work alongside health boards, police forces and other relevant statutory and non-statutory agencies to develop a pan-Wales child criminal exploitation risk assessment tool for use by frontline staff, including in healthcare settings. The rollout of the risk assessment tool should be accompanied by the programme of training and awareness raising that we advocate in Recommendation 11.

216. Effective multi-agency working depends on effective and time-efficient information sharing platforms. Developments in technology should be able to support these efforts, but digital information-sharing platforms can be notoriously problematic and expensive to roll out. We were therefore interested to hear about the West Glamorgan Multi-Agency Safeguarding Tracker (MAST), which we explore as a case study on page 78. We are encouraged to hear about the outcomes of the proof of concept, which seems to demonstrate that the platform has the potential to address some of the serious challenges facing frontline professionals when sharing safeguarding information between agencies.

217. There are, of course, many considerations to be made before any digital platform such as MAST becomes a central feature of multi-agency working in Wales: crucial issues around ethics, data security and protection, cost, staff training, etc. Any expansion of the platform must be subject to detailed scoping work, building on the proof of concept carried out by West Glamorgan Safeguarding Board. Based on the promising outcomes so far, we believe that there is enough potential here for the Welsh Government to explore the platform further.

Recommendation 13. The Welsh Government should explore the feasibility of a Wales-wide safeguarding information sharing platform, such as the West Glamorgan Safeguarding Board tracker, to improve information sharing across Wales.

218. Throughout this inquiry we have heard GDPR/data protection mentioned frequently as potential barriers to information sharing. This isn't surprising: data protection legislation is complex and multi-faceted, and it is evident that much, if

not all, of information shared between agencies about marginalised children would be subject to the most stringent data protection requirements.

219. We welcome that the Welsh Government has published tools and guidance to date, including the Welsh Accord on Sharing of Personal Information (WASPI) and the its 'Working together to safeguard people' non-statutory guide on information sharing. However, we are still unclear whether data protection legislation is a genuine obstacle to multi-agency working, whether agencies misunderstand their data protection obligations, or even whether data protection is sometimes used as an excuse when information is not shared as effectively and efficiently as it should be.

220. We were interested to hear that the Welsh Government had undertaken work alongside legal professionals to understand the impact of data protection legislation on the workings of the proposed Single Unified Safeguarding Reviews. We believe that work has a wider relevance to both statutory and non-statutory bodies that work with vulnerable children and their families. We therefore ask that the Welsh Government draw on its legal advice to set out clearly its understanding of the impact of data protection legislation on multi-agency working in relation to safeguarding vulnerable children.

Recommendation 14. In its response to our report, the Welsh Government should set out in detail its understanding of the impact of data protection legislation on multi-agency working in relation to safeguarding vulnerable children to help both statutory and non-statutory bodies understand their data protection obligations when working together to support marginalised children and their families.

Early intervention & preventative services

221. We agree with the overwhelming consensus across the evidence we have received: early intervention and preventative services are absolutely key to driving down rates of exploitation and abuse. When money is tight, funding tends to get prioritised to reactive services. This is often a false economy, because the cost to respond when things have gone wrong can be so much greater than the cost to intervene before they do. We commend the work carried out by different professionals across the country that aims to help children and their families *before* they become marginalised. We single out youth workers here, in particular, who have been highlighted time and time again throughout this inquiry for their skills working with and safeguarding the most vulnerable children and young people in Wales.

222. We also note the significant body of evidence that highlights schools as a critical site for early intervention. As well as their educational benefits, schools are one of the last remaining physical spaces that routinely link children and professionals. This is why not attending school can have disastrous consequences for some children, as we explore in the following chapter.

223. School staff are already asked to do so much, a significant proportion of which extends far beyond education. But as school staff will agree, safeguarding is a crucial, fundamental part of their role. We hope that our proposed training and awareness raising set out in Recommendation 11, which should be delivered to school staff as well as other frontline professionals, will help education professionals identify the risk factors and signs of criminal exploitation and respond appropriately.

224. We have heard that early intervention based in schools but delivered by external professionals can be particularly valuable. We have heard consistently positive feedback about the Wales Police Schools Programme, and are disappointed and concerned that the Welsh Government stopped funding this crucial programme in April 2024. We are pleased that certain police forces have taken the decision to fund their own work with schools, but, as a critical national prevention service, we do not believe they should have to. We ask the Welsh Government to provide a update on the future of the programme.

Recommendation 15. In its response to this report, the Welsh Government should provide an update on the long-term future of the Wales Police Schools Programme, outlining what, if any, centrally funded provision will replace this vital initiative.

Social services

225. In our work on the care system over the course of this Senedd, we have heard time and time again about the significant pressures on the social care workforce and the impact those pressures are having on social workers' relationships with vulnerable children and families. We are saddened, but not surprised, to hear very similar themes again here: concerns about high caseloads, staff turnover, agency staff, and limited capacity to carry out the relationship-centred social work that frontline professionals know to be effective.

226. We do not recognise the simplistic picture painted by those who wish to vilify social workers. The reality is much more complex, affected by the workforce

challenges noted above and increasingly levels and complexity of need, amongst other things.

227. During this inquiry we have heard about and met incredibly vulnerable children, many of whom have displayed challenging, even violent, behaviour as a result of their life experiences and exploitation. We know that the staff who work with these children can themselves be at risk as a consequence of their work to limit criminals' exploitation of children. Some stakeholders argued in favour of specialist teams of social workers to work alongside our most vulnerable children and families. We heard – positively – about some local authorities who had set up dedicated teams with this in mind. Others felt differently, and argued that all social workers should have the right skills to work with the children affected by the issues in this report.

228. We are interested to hear the Welsh Government's view on this matter. Unfortunately, we did not feel that our question was addressed during oral scrutiny. We ask it again here.

Recommendation 16. In its response to this report, the Welsh Government should set out its views on the merits or otherwise of specialist teams within social services departments that work with children who go missing, and/are sexually and/or criminally exploited.

4. Risk factors for marginalisation

There is no template to describe a child who goes missing or is criminally exploited. Any child, no matter their personal characteristics or life experiences, can experience marginalisation. But there are risk factors that make some children more vulnerable to marginalisation than others. Children who are subject to multiple, compounding risk factors are particularly vulnerable.

229. Throughout our inquiry, stakeholders stressed that any child can face marginalisation. The Jay Review summarises most clearly what we heard from numerous professionals and academics:

“There is no single cause that leads to one child being exploited when another is not, much like other forms of abuse. Witnesses noted that it was vital to ‘hold in mind that this form of harm can ensnare even the happiest, healthiest and well-loved children and young people’.”³²²

230. However, stakeholders also identified a number of clear risk factors for children, which may make them more vulnerable to going missing, being exploited, facing homelessness or other forms of marginalisation without the right protection and support.

Children not in an education setting

The protective role of schools

231. The risks facing excluded children or children who refuse to go to school were raised with us more than any other single risk factor for marginalisation. The Jay Review heard similar evidence:

³²² Jay, A. et al, ‘[Shattered lives, stolen futures. The Jay Review of Criminally Exploited Children](#)’, March 2024, page 19

“The significant impact of being excluded – whether officially or unofficially – from education was a running theme across all the stories we heard from those with lived experience. The correlation with exploitation is clear and children and parents often described that as being the tipping point at which things began to go wrong quickly.”³²³

The evidence we received backed up those conclusions. Stakeholders regularly reported to us that very few, if any, children who have been exploited or frequently go missing regularly attend school.³²⁴ Action for Children wrote that over 90% of children referred to their services in Wales have faced education exclusion.³²⁵

232. The Association of Directors of Education told us that schools play a vital role as a protective environment for all children, particularly for vulnerable pupils. They explain that “schools are the only constant many of these young people have where boundaries are clear and expectations are high”.³²⁶ The Jay Review, and much of the evidence we received, made similar arguments.³²⁷ Voices from Care Cymru reported that children who are not in schools may lack supervision, support from teachers and peers, and access to resources and opportunities. They also argued that schools can equip children with the skills to recognise and respond to danger, empowering children to assert their rights and protect themselves from harm.³²⁸ The young people who spoke to our Citizen Engagement Team agreed, and underscored the critical importance of early intervention by educators, who are often in the best position to notice behavioural changes indicative of external risks:

³²³ Jay, A. et al, [‘Shattered lives, stolen futures. The Jay Review of Criminally Exploited Children’](#), March 2024, page 59

³²⁴ [Written evidence, CYPM11 Bridgend County Borough Council; Children, Young People and Education Committee, ‘Findings of stakeholder events’](#), September 2024, page 19

³²⁵ [Written evidence, CYPM25B Action for Children](#)

³²⁶ [Letter from the Association of Directors of Education in Wales to the Chair of the Children, Young People and Education Committee](#), 23 August 2024

³²⁷ Jay, A. et al, [‘Shattered lives, stolen futures. The Jay Review of Criminally Exploited Children’](#), March 2024, page 20; [Written evidence, CYPM30 Children’s Legal Centre Wales; Written evidence, CYPM27 Welsh Women’s Aid; Written evidence, CYPM28 National Youth Advocacy Service Wales \(NYAS Cymru\); Written evidence, CYPM13 CASCADE, Cardiff University; Written evidence, CYPM20 Estyn; Equality and Social Justice Committee, 5 December 2022, Record of Proceedings](#), paragraph 295; Children, Young People and Education Committee, [‘Findings of stakeholder events’](#), September 2024, page 19

³²⁸ [Written evidence, CYPM14 Voices from Care Cymru](#)

“You have to look for it in school, it all stems from school...You’ll definitely see changes if there’s something going on outside, so that’s the best place to pick it up.”³²⁹

We discuss the value of schools as sites for early intervention on page 82.

233. As the former Children’s Commissioner for England argued in 2019, “Schools have a range of safeguarding responsibilities, which they discharge within the school or by notifying other agencies. All this is lost when a child is excluded or off-rolled”.³³⁰ A number of organisations raised concern about a perceived increase in exclusions, reduced timetables, off-rolling and other forms of school absence.³³¹ Our Citizen Engagement Team heard strong concerns from young people with lived experience of criminalisation about the practice of placing vulnerable learners on reduced timetables:

“Reduced timetables got to stop, even if those kids have to go to special lessons or do work experience or learn skills or something, just to chuck them on the street and say, ‘Fuck you, fend for yourself,’ that’s a...joke!”³³²

234. The Welsh Government has recently published data which found that approximately 6.4% of children (27,000) in GP registration data could not be found in state education records on 20 April 2021.³³³ This autumn, Welsh Government announced its plans to take forward a mechanism for local authorities to identify children who are missing education by implementing the Children Act 2004 Children Missing Education Database (Wales) Regulations. The Cabinet Secretary for Education stated that:

“To determine the effectiveness of the regulations in identifying children who may be missing education, and to identify any practical difficulties that may need to be addressed, I have agreed that the database arrangements will be piloted across

³²⁹ Citizen Engagement Team, ‘[Children and young people on the margins: Engagement findings](#)’, October 2024, page 8

³³⁰ Children’s Commissioner for England, ‘[Keeping kids safe: Improving safeguarding responses to gang violence and criminal exploitation](#)’, February 2019, page 24

³³¹ [Written evidence, CYPM30 Children’s Legal Centre Wales: Written evidence, CYPM21 Barnardo’s Cymru](#); Jay, A. et al, ‘[Shattered lives, stolen futures. The Jay Review of Criminally Exploited Children](#)’, March 2024, page 20; Equality and Social Justice Committee, [5 December 2022, Record of Proceedings](#), paragraphs 140 and 295

³³² Citizen Engagement Team, ‘[Children and young people on the margins: Engagement findings](#)’, October 2024, page 9

³³³ Welsh Government, ‘[Children missing from state education: estimating numbers using linked administrative data](#)’, 18 September 2024

*a small number of local authorities for the first year. The pilot will undergo a full evaluation, with any required changes made ahead of the proposed wider roll-out across Wales.*³³⁴

235. The Jay Review also explains that exclusion from mainstream education can be traumatising for children in and of itself by creating an increased sense of rejection, failure and low wellbeing.³³⁵ Action for Children added that children who are not engaged in education may also be dealing with broader challenges such as family relationship breakdowns, emotional or mental difficulties, and offending behaviour.³³⁶

236. Both Action for Children and Bridgend County Borough Council recognised that schools need more support to reduce exclusions, urging the Welsh Government should work with schools to develop resources to help them manage behaviour and prevent school exclusion.³³⁷ Some stakeholders went further by suggesting that the Welsh Government should adopt zero exclusion policies for schools to ensure that all children benefit from a protective school environment. They spoke positively about Southwark Council's zero exclusion policy, and suggested that having something like that in Wales would set a different tone for both pupils and teachers.³³⁸

237. The Association of Directors of Education in Wales acknowledged that exclusions have a major impact on children and young people and can put them at additional risk of marginalisation. They told us that opportunities to safeguard children are missed when they are not in school, and agreed that exclusion – especially permanent exclusion – is a “traumatising experience for a child or young person, who may feel the rejection acutely”. They highlighted that Welsh Government's guidance makes it clear that mitigating circumstances – including marginalisation – must be considered in relation to exclusions, as well as ensuring that the school behaviour policy is based on trauma informed approaches. However, while they agree that the use of exclusion should be reduced, they

³³⁴ Welsh Government, [‘Written Statement: Consultation outcome - the Children Act 2004 Children Missing Education Database \(Wales\) Regulations’](#), 11 September 2024

³³⁵ Jay, A. et al, [‘Shattered lives, stolen futures. The Jay Review of Criminally Exploited Children’](#), March 2024, pages 20 and 59

³³⁶ [Written evidence, CYPM25B Action for Children](#)

³³⁷ [Written evidence, CYPM11 Bridgend County Borough Council; Written evidence, CYPM25B Action for Children](#)

³³⁸ Children, Young People and Education Committee, [‘Findings of stakeholder events’](#), September 2024, page 20

argue that there is a place for exclusion “in cases of serious breach of policy or when the safety of the school community is at risk”.³³⁹

Children educated at home

238. We received particularly mixed views about the vulnerability or otherwise of children who are educated at home. Education Otherwise asserted that:

“... children not in mainstream education’ [as a potential at-risk group] sweeps up home educated children wrongly classifying them as at risk of criminal exploitation. Welsh Government is aware that research finds home educated young people considerably less likely than their schooled counterparts to commit an offence leading to a disposal and consequently, less likely to be on the margins of or involved with criminal enterprise. These are not at risk children and any findings must reflect that.”³⁴⁰

A series of other individual respondents shared similar views³⁴¹, asserting that including home educated children as part of an at risk group is “completely unacceptable conduct”³⁴², “defamatory”³⁴³, “damaging”³⁴⁴, “insulting and unlawful”³⁴⁵.

239. However, while the Welsh Local Government Association agreed that many children educated at home are “in safe, caring and nurturing environments and receiving an appropriate education relevant to their age and ability”, they added that “this is not always the case”.³⁴⁶ The Association of School and College Leaders Cymru, meanwhile, highlighted a risk that home educated children drop off the radar, and advocated regular safeguarding check-ins and exploration of why the child is not attended mainstream education.³⁴⁷

³³⁹ [Letter from the Association of Directors of Education in Wales to the Chair of the Children, Young People and Education Committee](#), 23 August 2024

³⁴⁰ [Written evidence, CYPM4 Education Otherwise](#)

³⁴¹ [Written evidence, CYPM10 Individual](#)

³⁴² [Written evidence, CYPM5 Individual](#)

³⁴³ [Written evidence, CYPM6 Kelly Anderson](#)

³⁴⁴ [Written evidence, CYPM7 Christian Education for Deeside](#)

³⁴⁵ [Written evidence, CYPM9 Individual](#)

³⁴⁶ [Written evidence, CYPM26 Welsh Local Government Association](#)

³⁴⁷ [Written evidence, CYPM12 Association of School and College Leaders Cymru](#)

Care experienced children

240. We heard repeatedly that care experienced children are often particularly vulnerable to marginalisation, both because of legacy of the trauma that many have experienced and because of the pressures and challenges facing them in their day-to-day lives.³⁴⁸

241. We heard that there are multiple, compounding and interlinked causes of this vulnerability:

- There is a significant shortage of high quality foster and residential care placements for children looked after. This leads some children to gravitate back to their family home, or being placed in unsafe and unregulated accommodation, putting them at risk of further abuse or trauma.³⁴⁹ South Wales Police highlighted to us concerns about the Health and Social Care (Wales) Bill, currently passing through the Senedd, which it suggests may present “an increased risk to children looked after and their susceptibility to exploitation” (we have written to the Senedd’s Health and Social Care Committee with similar concerns).³⁵⁰
- Children in care do not necessarily have support structures around them to protect them from the dangers of going missing and/or exploitation.³⁵¹
- Children in care may have experienced trauma, which can make them more susceptible to exploitation and manipulation. Some exploiters deliberately target children in care to exploit those vulnerabilities.³⁵²

³⁴⁸ Jay, A. et al, ‘[Shattered lives, stolen futures. The Jay Review of Criminally Exploited Children](#)’, March 2024, page 25

³⁴⁹ Children, Young People and Education Committee, ‘[Findings of stakeholder events](#)’, September 2024, page 19; Children, Young People and Education Committee, ‘[Findings of engagement activities](#)’, September 2024, page 3

³⁵⁰ [Letter from Policing in Wales to the Chair of the Children, Young People and Education Committee](#), 23 August 2024; [Letter from the Chair of the Children, Young People and Education Committee to the Temporary Chair of the Health and Social Care Committee](#), 18 July 2024

³⁵¹ [Written evidence, CYPM14 Voices from Care Cymru; Written evidence, CYPM29 British Psychological Society \(BPS\)](#)

³⁵² [Written evidence, CYPM14 Voices from Care Cymru](#); Jay, A. et al, ‘[Shattered lives, stolen futures. The Jay Review of Criminally Exploited Children](#)’, March 2024, page 25; [Written evidence, CYPM25B Action for Children](#)

- Some children may view a criminal gang as a family, giving them a sense of belonging, and even perceived protection, that they might not have within the care system.³⁵³

242. Some stakeholders highlighted that rates of exclusion from, or refusal to attend, mainstream school is particularly high for children in care. The Association of School and College Leaders Cymru argued that school is often the main care givers for children in care:

“when this relationship [between the child and the school] becomes more challenging or difficult due to extreme SEBD [Social, Emotional and Behavioural Difficulties] issues, wider police issues or change of placement, this places the vulnerable child at even more risk. The lack of a main or consistent care giver, places the child at extreme risk.”³⁵⁴

The Children’s Legal Centre Wales cited research from England, which indicated that children who are care experienced are 3 times more likely to be excluded from school. They called for the Welsh Government to reverse its decision to stop collecting data on the numbers of care experienced children who are excluded.³⁵⁵ We made similar calls in our report on radical reform for care experienced children and young people.³⁵⁶ The Welsh Government rejected our recommendation.³⁵⁷

243. The limited published data backs up these concerns, showing that children in care are much more likely than other children to be reported missing. Notwithstanding concerns raised about the reliability of that data, as we explore earlier in this report, organisations working with children in care agreed that they are more likely to run away from placements, particularly those in residential care and/or those who have experienced multiple placement breakdowns.³⁵⁸ And, as when any child goes missing, missing episodes amongst care experienced

³⁵³ [Written evidence, CYPM13 CASCADE, Cardiff University; Written evidence, CYPM14 Voices from Care Cymru; Children, Young People and Education Committee, ‘Findings of engagement activities’, September 2024, page 5](#)

³⁵⁴ [Written evidence, CYPM12 Association of School and College Leaders Cymru](#)

³⁵⁵ [Written evidence, CYPM30 Children’s Legal Centre Wales](#)

³⁵⁶ Children, Young People and Education Committee, [‘If not now, then when? Radical reform for care experienced children and young people’](#), May 2023, pages 51-54

³⁵⁷ Welsh Government, [‘Written Response by the Welsh Government to the report of the Children, Young People and Education Committee report entitled “If not now, then when? Radical reform for care experienced children and young people”](#)’, 5 July 2023, pages 6-7

³⁵⁸ [Written evidence, CYPM28 National Youth Advocacy Service Wales \(NYAS Cymru\); Written evidence, CYPM13 CASCADE, Cardiff University; Written evidence, CYPM18 The Children’s Society; Written evidence, CYPM21 Barnardo’s Cymru](#)

children are both a risk factor for exploitation, and an indication that exploitation may already be taking place.³⁵⁹

Case study: Denbighshire County Council & Mind of my Own ‘One’ app

Mind of My Own ‘One’ is a digital engagement platform (app & website) that has been commissioned by Denbighshire Education and Children’s Services from Mind of My Own - an app development company specialising in education, health, and care services³⁶⁰ - since 2020.

The platform is offered to children and young people open to Denbighshire County Council’s Education and Children’s Services as an accessible way to engage with their workers. They can share their views before/after meetings or statutory reviews, raise problems, or share good news like a positive school report.

We spoke to one young woman in foster care about the app:

“The Mind of My Own [‘One’] app has helped me tremendously since I started to use the app as I’m able to update it whenever and wherever I want. It even has a mini blog for me to update as much or as little as I like...”

“Since using this app, I have been able to have more confidence in myself and have been able to speak to my IRO [Independent Reviewing Officer] without having a LAC [Looked After Child] review I just send her my statement that she asks me questions about at my LAC review. I have also been able to express my emotions more and be able to say why I am feeling this way.”

She also told us that she used the app when she went missing:

“It made it easier to write why I had gone missing and not having to speak face to face with someone at the time, it showed my social worker had read my comments too.”

The young woman’s foster carer told us:

“From a carer’s perspective I feel it gives young people complete autonomy in recording things that are personal to them, directly with the person or persons who are involved in their care. Also, they receive a notification when they have been read and can receive a reply. This shows that they have been listened to.”

³⁵⁹ [Written evidence, CYPM26 Welsh Local Government Association; Written evidence, CYPM13 CASCADE, Cardiff University](#)

³⁶⁰ [Mind Of My Own, ‘One app’](#)

Denbighshire County Council shared the views of other practitioners:

“I love the way it helps young people be part of the journey and involve them in choices whilst recognising they may have a completely differing opinion to a professional person.”

“Mind of My Own has been a fantastic tool in ensuring the voice of the child is heard. Many children that I support find communication or expressing themselves difficult, through using Mind of my Own it has given them the space to be able to share their thoughts and experiences and open up conversations that we may not have been able to have if we hadn’t used Mind of My Own.”

244. For many, including the Welsh Local Government Association, Barnardo’s Cymru and the Welsh Government, placing children out of their home local authority is a particular driver for missing episodes.³⁶¹ NYAS Cymru, The Children’s Society and the Jay Review all argue that placing children outside their local area – even if the decision is made to safeguard the child due to perceived dangers – can push children away from their friends, family and support network. In turn, this can push them towards extra-familial harm.³⁶² Education Otherwise argued that children should not be forced to live out of area unless for essential safeguarding reasons.³⁶³

245. The Children’s Society raised concerns to us about information sharing between local authorities following out of area placements. They point to local authorities’ approaches as inconsistent, or non-existent, which they argue places children at risk of abuse or exploitation (we have raised concerns on this issue to the Health and Social Care Committee³⁶⁴). They call for the Welsh Government to publish guidance on developing robust and consistent information sharing frameworks for all local authorities in Wales.³⁶⁵

³⁶¹ [Written evidence. CYPM26 Welsh Local Government Association; Written evidence. CYPM21 Barnardo’s Cymru](#); Children, Young People and Education Committee, ‘[Findings of stakeholder events](#)’, September 2024, page 19; Welsh Government, ‘[Children and Young People on the margins: Evidence to the Children, Young People and Education Committee](#)’, September 2024, page 9

³⁶² [Written evidence. CYPM28 National Youth Advocacy Service Wales \(NYAS Cymru\); Written evidence. CYPM18 The Children’s Society](#); Jay, A. et al, ‘[Shattered lives, stolen futures. The Jay Review of Criminally Exploited Children](#)’, March 2024, page 62

³⁶³ [Written evidence. CYPM4 Education Otherwise](#)

³⁶⁴ [Letter from the Chair of the Children, Young People and Education Committee to the temporary Chair of the Health and Social Care Committee](#), 18 July 2024

³⁶⁵ [Written evidence. CYPM18 The Children’s Society](#)

246. To protect children in care from marginalisation, Voices from Care Cymru argued for a focus on trauma-informed, relationship-based early intervention:

“The most effective way to address this is for children and young people to be cared for in a way that is loving and supportive and trauma informed, so that they do not end up vulnerable and isolated. Much more effective support is needed for young people leaving the care system. Early intervention is key.”³⁶⁶

The Jay Review argued that a large proportion of children in care are now teenagers, which has “shifted the requirements of the child protection and care system significantly and rapidly without a similar scale of change in frameworks, practice guidance, funding or infrastructure needed to respond.”³⁶⁷

247. The Welsh Government has set out its vision for more children to be supported to remain with their families and for fewer children to enter care. They acknowledge that children who are placed outside of their local area are at greater risk of going missing, and reminded the Committee of its care leavers summits, facilitated by Voice from Care Cymru, which “have provided an opportunity for Ministers to hear directly from children and young people about their experiences and their thoughts on what changes need to be made”. They also outline:

- the Welsh Government’s Corporate Parenting Charter, launched in September 2023, which they say aims to “drive consistency of approach across public bodies in Wales, improve engagement and raise standards of expectations of all who act as a corporate parent to the children and young people who are looked after and care leavers”;
- the commitment to eliminate profit from the care of children looked after (delivered via the Health and Social Care (Wales) Bill, being scrutinised by the Senedd at the time of writing), which the paper claims will enable local authorities to plan and secure appropriate care placements more effectively, leading to better social, educational, and health outcomes; and
- the entitlement of children in care to advocacy, the duties on local authorities to consider whether to appoint an independent visitor, and

³⁶⁶ [Written evidence. CYPM14. Voices from Care Cymru](#)

³⁶⁷ Jay, A. et al, ‘[Shattered lives, stolen futures. The Jay Review of Criminally Exploited Children](#)’, March 2024, page 55

children’s review meetings, chaired by an Independent Reviewing Officer.³⁶⁸

248. The Minister for Children and Social Care re-iterated to us the Welsh Government’s commitment to keeping children out of care. Contrary to our concerns about provision in the Health and Social Care (Wales) Bill about out of area placements, the Minister stressed that the Bill would enable local authorities to place children in more appropriate settings, closer to their homes.³⁶⁹

249. In our report on radical reform for care experienced children and young people, we called for corporate parenting to be placed on a statutory footing. We concluded that:

“We are not convinced that the Welsh Government’s proposed corporate parenting charter will deliver tangible and meaningful change. The scale of what needs to be transformed is too great. It has no statutory footing, and we see no clear way by which public bodies can be held to account for delivery of the commitments they make in the charter, nor what enforcement action can be taken - and by whom - if they do not deliver on those commitments..”³⁷⁰

The Children’s Commissioner for Wales has raised similar concerns, arguing that “it is up to individual bodies in Wales whether they sign up at all, and/or what their commitments look like.” She concludes that “more could and should be done to require organisations to commit to responsibilities in this area.”³⁷¹

250. The Welsh Government acknowledged to us that children in the care system are particularly vulnerable to marginalisation, observing that they are three times more likely to go missing than other children.³⁷² We asked the Minister for Children and Social Care for her impressions of how corporate parents are responding to the Welsh Government’s Corporate Parenting Charter. The Minister told us that around 60 organisations have voluntarily signed up to the charter, and that she is hoping to promote it more widely, including to the private sector.

³⁶⁸ Welsh Government, [‘Children and Young People on the margins: Evidence to the Children, Young People and Education Committee’](#), September 2024, page 11

³⁶⁹ Children, Young People and Education Committee, [19 September 2024, Record of Proceedings](#), paragraphs 11-13

³⁷⁰ Children, Young People and Education Committee, [‘If not now, then when? Radical reform for care experienced children and young people’](#), May 2023, page 44

³⁷¹ Children’s Commissioner for Wales, [‘Annual Report & Accounts 2023-24’](#), October 2024, page 26

³⁷² Welsh Government, [‘Children and Young People on the margins: Evidence to the Children, Young People and Education Committee’](#), September 2024, page 9

The Welsh Government's Deputy Director of Social Services Enabling added that he had heard feedback from practitioners that a key challenge is not that there is a lack of guidance for care leavers. The challenge is ensuring that what *should* be happening between housing and children's services departments is actually happening in practice: for example, ensuring that pathway plans for care leavers are put in place to prepare them for leaving care.

251. There are already legislative duties and statutory guidance setting out how statutory agencies must support care experienced children (under the Part 6 Code of Practice for looked after and accommodated children, for example).³⁷³ Nevertheless, the Minister told us:

*"I think we see too much inconsistency. We see really good examples of really good practice in the way these issues are dealt with, and some very poor examples, and if one local authority and health board can do it really well, with good results, then others should be able to do it as well."*³⁷⁴

Unaccompanied asylum seeking children

252. Unaccompanied asylum seeking children have been separated from both birth parents and are not in the care of a guardian. These children will usually be 'looked after' by the local authority.

253. We received evidence from a range of organisations stressing the vulnerability of unaccompanied asylum seeking children. The Children's Society wrote that "Unaccompanied children and young people are some of the most vulnerable members of our society, who are required to engage with the complex process of seeking asylum, often while experiencing trauma and upheaval."³⁷⁵

254. This vulnerability, we heard, places unaccompanied asylum seeking children at a high risk of going missing or being exploited. Stakeholders including the Bevan Foundation wrote that unaccompanied children are at heightened risk of abduction, trafficking, and exploitation. They pointed us towards UK Government guidance that identifies insecure immigration status, such as unaccompanied

³⁷³ Welsh Government, '[Social Services and Well-being \(Wales\) Act 2014: Part 6 Code of Practice \(Looked After and Accommodated Children\)](#)', April 2018

³⁷⁴ Children, Young People and Education Committee, [19 September 2024. Record of Proceedings](#), paragraphs 147-156

³⁷⁵ [Written evidence, CYPM18. The Children's Society](#)

asylum-seeking children and refugees, as one of the key risk factors that heighten a person's vulnerability to criminal (including 'county lines') exploitation.³⁷⁶

255. Some stakeholders raised concern about the implementation of UK-wide legislation relating to unaccompanied asylum seeking children. The Welsh Local Government Association argued that the National Transfer Scheme (participation in which is now mandatory for all local authorities in the UK³⁷⁷) has resulted in increasing numbers of Unaccompanied Asylum Seeking Children being placed in Wales. They state that these children can go missing "as they do not feel their needs can be met in the area, especially in rural parts of Wales".³⁷⁸

256. Both the Bevan Foundation and the Children's Legal Centre Wales criticised the Illegal Migration Act (2023), which they argue places unaccompanied asylum seeking children approaching 18 at risk of criminalisation or exploitation. They explain that children are likely to abscond to avoid the detention and potential removal as set out in that Act.³⁷⁹

257. We heard multiple calls for a National Guardianship Service for unaccompanied children.³⁸⁰ The case for a National Guardianship Service is made comprehensively by a joint briefing by The Children's Legal Centre Wales, the Children's Society, The Bevan Foundation and the British Red Cross. In summary, the briefing proposes that the guardianship service should have the following key factors:

- A supportive and engaging service, aiming to build trust with the child, help the child adjust to their life in the UK, advocate on behalf of the child, help them obtain legal advice, and liaise with lawyers and other professionals on behalf of the child.

³⁷⁶ [Written evidence, CYPM17 Bevan Foundation; Written evidence, CYPM28 National Youth Advocacy Service Wales \(NYAS Cymru\); Jay, A. et al, 'Shattered lives, stolen futures. The Jay Review of Criminally Exploited Children', March 2024, page 26; UK Government, 'Criminal exploitation of children and vulnerable adults: county lines', 20 October 2023; Written evidence, CYPM14 Voices from Care Cymru](#)

³⁷⁷ [UK Government, 'National Transfer Scheme Protocol for Unaccompanied Asylum Seeking Children', 17 August 2003, page 3](#)

³⁷⁸ [Written evidence, CYPM26 Welsh Local Government Association](#)

³⁷⁹ [Written evidence, CYPM17 Bevan Foundation; Written evidence, CYPM30 Children's Legal Centre Wales](#)

³⁸⁰ [NYAS Cymru & The Children's Society, 'Missing the Point', November 2020, page 14; Written evidence, CYPM30 Children's Legal Centre Wales; Written evidence, CYPM18 The Children's Society; Written evidence, CYPM30 Children's Legal Centre Wales; Written evidence, CYPM17 Bevan Foundation; Jay, A. et al, 'Shattered lives, stolen futures. The Jay Review of Criminally Exploited Children', March 2024, page 80](#)

- A guardian should be allocated to every unaccompanied child on their arrival to the Wales.
- The service should be independent of any statutory body.
- The service should be staffed by fully trained workers, who would work closely with social workers, legal advisors and other third sector and statutory services. It should be well-resourced, responsive and child-focused.³⁸¹

258. The briefing argues that the Scottish Guardianship Service provides an “exemplary” model, which demonstrates that a Welsh service has the potential to improve the lives of Unaccompanied Asylum Seeking Children, support social workers and other agencies as they carry out age assessments, and reduce missing episodes and prevent criminalisation, amongst other benefits.³⁸²

259. In April 2017, the Equality, Local Government and Communities Committee of the then National Assembly for Wales recommended that the Welsh Government “establish a Guardianship service for Wales, supported by peer networks, as part of reaffirming Wales’ commitment to welcome unaccompanied asylum seeking children.”³⁸³ In its response to the Committee’s report, the Welsh Government accepted the recommendation in principle and stated that “work was currently underway to explore how such a service could be developed in Wales”.³⁸⁴ It is not clear what progress has been made since then.

260. The Welsh Government acknowledges that unaccompanied asylum-seeking children are a group of children at a higher risk of going missing or being exploited. They recognise that arriving alone within a foreign country can have “a devastating and lasting impact on the lives of children and young people”. It notes that Wales has access to the English-Wales Independent Child Trafficking Guardianship (ICTG) service, but acknowledges that the significant rise in the numbers of unaccompanied asylum-seeking children may mean that there needs to be a dedicated service for Wales. The paper commits to considering the current

³⁸¹ The Children’s Legal Centre Wales, the Children’s Society, The Bevan Foundation and the British Red Cross, [‘A Guardianship Service for All Unaccompanied Children in Wales: A research briefing’](#), April 2024, pages 30-31

³⁸² The Children’s Legal Centre Wales, the Children’s Society, The Bevan Foundation and the British Red Cross, [‘A Guardianship Service for All Unaccompanied Children in Wales: A research briefing’](#), April 2024, pages 6 and 33-34

³⁸³ Equality, Local Government and Communities Committee, [‘“I used to be someone”: Refugees and asylum seekers in Wales’](#), April 2017, page 55

³⁸⁴ Welsh Government, [‘Written Response by the Welsh Government to the report of the Equality, Local Government and Communities Committee entitled “I used to be someone”: Refugees and asylum seekers in Wales’](#), June 2017

support available for unaccompanied children and young people, and to exploring how a guardianship service could work in Wales, the resources needed to implement such a system and how it could complement the statutory services that are already available.³⁸⁵

Neurodivergent children and children with learning disabilities

261. We received a substantial body of evidence about the potential vulnerability of neurodivergent children and children with learning disabilities. Despite encompassing very broad groups of people with a range of distinct needs and experiences, our evidence suggests that neurodivergent children and children with learning disabilities may have a shared vulnerability to marginalisation. This shared vulnerability, we heard, stems from the challenges they may face engaging with society more generally.³⁸⁶

262. Learning Disability Wales highlighted that:

“Evidence suggests that children with a learning disability are more vulnerable to exploitation. This is reflective of the many barriers faced by children and young people with a learning disability more generally in their lives, consequently meaning they are more at risk of being exposed to predatory adults.”

They state that young people with learning disabilities often find themselves infantilised, over protected at one stage in their life and under protected in another. They explain that children with a learning disability are “different, nuanced and individualistic”, and highlight that they may not understand that they have been exploited, groomed or abused by predators. They argue that the Welsh Government should produce research to better understand the scale of exploitation of young people with learning disabilities, and that public servants should receive training to understand how the abuse these children face might be manifested and evidenced.³⁸⁷

263. The Jay Review reported that “neurodiversity was cited in nearly all the examples we heard of exploited children, with undiagnosed or untreated ADHD noted as a significant risk factor by multiple witnesses.”³⁸⁸ They, Voices from Care

³⁸⁵ Welsh Government, [‘Children and Young People on the margins: Evidence to the Children, Young People and Education Committee’](#), September 2024, pages 9, 11 to 12

³⁸⁶ Children, Young People and Education Committee, [‘Findings of stakeholder events’](#), September 2024, page 21

³⁸⁷ [Written evidence, CYPM8 Learning Disability Wales](#)

³⁸⁸ Jay, A. et al, [‘Shattered lives, stolen futures. The Jay Review of Criminally Exploited Children’](#), March 2024, page 25

Cymru and Cymorth Cymru all reported that neurodivergent children may also experience barriers relating to the availability and quality of services.³⁸⁹ The parents with lived experience of CCE who engaged with our Citizen Engagement team shared similar views:

“My kids have got ADD and Autism. I’ve got ADHD and PTSD. I would like the weight lifted off my shoulders, not in a way where someone is gonna carry me but in a way where I’m not begging for support that should have already been in place. My mental health is suffering, which is gonna have a knock-on effect on my children, I feel like a robot, I don’t feel like a person.”³⁹⁰

264. Others highlighted the increased likelihood of neurodivergent children being excluded from education settings, which means that they do not benefit from the protective qualities of education establishments, as explored above.³⁹¹

Children with speech, language and communication needs (SLCN)

265. In April 2023, the Senedd’s Equality and Social Justice Committee published its report about speech, language and communication needs in the youth justice system. The report, drawing heavily on evidence from the Royal College of Speech and Language Therapists, found that around 60% of children in the youth justice system have SLCN, and that “the impact of SLCN on children and young people and their heightened chances of becoming involved with the criminal justice system has not received the level of attention it deserves”. It made a series of recommendations to the Welsh Government that aim to both prevent children with SLCN entering the youth justice system in the first place, and to support them when they are there.³⁹²

266. The Welsh Government accepted 3 of the recommendations in full, 2 in principle and rejected 2.³⁹³ However, the Equality and Social Justice Committee has since expressed disappointment at the pace of the Welsh Government’s

³⁸⁹ Jay, A. et al, ‘[Shattered lives, stolen futures. The Jay Review of Criminally Exploited Children](#)’, March 2024, page 25; [Written evidence, CYPM14 Voices from Care Cymru: Written evidence, CYPM31 Cymorth Cymru](#)

³⁹⁰ Citizen Engagement Team, ‘[Children and young people on the margins: Engagement findings](#)’, October 2024, page 7

³⁹¹ [Written evidence, CYPM30 Children’s Legal Centre Wales](#)

³⁹² Equality and Social Justice Committee, ‘[60% - Giving them a voice. Speech, language and communication needs in the youth justice system](#)’, 16 April 2023

³⁹³ Welsh Government, ‘[Written response from the Welsh Government to the report by the Equality and Social Justice Committee entitled 60% - Giving them a voice - Speech, Language and Communication Needs in the Youth Justice System](#)’, 7 June 2023

implementation of the agreed recommendations, and observed a "marked change in the Government's tone which we find deeply disappointing."³⁹⁴ They have committed to continue to monitor the government's practical response to the report. The Welsh Government stated that its position remains as set out in its response to the Committee's report and in correspondence since, and reiterated the constraints arising from the limited speech and language therapy workforce in Wales.³⁹⁵

267. The Royal College of Speech and Language Therapists submitted comprehensive views about the impact of SLCN on children, and their relevance to our inquiry:

*"While members of the public will often think of children who have difficulties with pronunciation (speech sounds) or stammering, in the cohort of vulnerable children, SLCN more commonly encompass difficulties understanding and remembering what is said to them, explaining and expressing themselves, or following the 'rules' of social interaction. In vulnerable children these needs often go unrecognised because behaviour and trauma can mask the difficulties a child or young person has communicating. For example, outbursts may be attributed to bad behaviour requiring punishment, rather than recognising that inadequate support of a communication need has led to an escalation in distress."*³⁹⁶

268. They argued that children with SLCN are at a higher risk of a series of poor outcomes, including mental health problems, exclusion from school, unemployment, and involvement in the criminal justice system. They responded positively to recent Welsh Government guidance on school attendance, which included a section on SLCN that highlights the necessity to have clear systems in place to ensure children develop their speech and language skills to their full potential. They also welcome that the Welsh Government has commissioned a speech and language therapist to undertake interviews with school staff around

³⁹⁴ [Letter from the Chair of the Equality and Social Justice Committee to the Cabinet Secretary for Culture and Social Justice, Trefnydd and Chief Whip](#), 1 July 2024

³⁹⁵ [Letter from the Cabinet Secretary for Culture and Social Justice, Trefnydd and Chief Whip to the Chair of the Equality and Social Justice Committee](#), 30 August 2024

³⁹⁶ [Written evidence, CYPM24 Royal College of Speech and Language Therapists \(RCSLT\)](#)

the link between exclusions and SLCN, and a recently early intervention initiative being trialled within youth justice services in Neath Port Talbot and Cardiff.³⁹⁷

269. However, they share the Equality and Social Justice Committee's concerns about the Welsh Government's progress since the Committee's report. They call for:

- statutory guidance and training for staff who work in services for vulnerable children, parents, guardians and families to understand more about SLCN, its prevalence, and how to identify and support children with SLCN;
- speech and language therapists to be embedded within or readily available to all relevant services for vulnerable children and young people; and
- clarity from the Ministry of Justice about whether future youth justice funding streams will prioritise speech and language therapy.³⁹⁸

Children living in poverty

270. We heard that there is an increased likelihood of exploitation and marginalisation against the backdrop of poverty.³⁹⁹ The Jay Review concludes:

"Witnesses were clear that no strategy to reduce exploitation and violence would succeed without comprehensive systemic interventions to tackle poverty... Poverty and social deprivation were described as the 'backcloth' to exploitation, with children living in 'circumstances where the legitimate economy is not a way that they can see to earn the kind of status and living that they wish to earn'"⁴⁰⁰

271. Some of the evidence we received explained that poverty is used by exploiters to tempt children into criminal activity. CASCADE reported research

³⁹⁷ Additional information, CYPM24 Royal College of Speech and Language Therapists (RCSLT)

³⁹⁸ Written evidence, CYPM24 Royal College of Speech and Language Therapists (RCSLT); Additional information, CYPM24 Royal College of Speech and Language Therapists (RCSLT)

³⁹⁹ Written evidence, CYPM25B Action for Children; Written evidence, CYPM27 Welsh Women's Aid; Written evidence, CYPM28 National Youth Advocacy Service Wales (NYAS Cymru); Written evidence, CYPM3 RAY Ceredigion; Written evidence, CYPM17 Bevan Foundation; Citizen Engagement Team, 'Children and young people on the margins: Engagement findings', October 2024, page 6

⁴⁰⁰ Jay, A. et al, 'Shattered lives, stolen futures. The Jay Review of Criminally Exploited Children', March 2024, page 24

which found that criminal exploitation provides children with a route to living “a nice life like everyone else”.⁴⁰¹ The Children’s Legal Centre Wales suggested that even minor financial debt can be entry points for exploitation.⁴⁰² Evidence from the Association of School and College Leaders Cymru reinforced that argument, highlighting higher prevalence of drug-related exploitation, including county lines, in low socioeconomic areas.⁴⁰³ Action for Children also noted similar patterns of rising drug use and county lines in poor rural areas.⁴⁰⁴

272. Others felt that poverty is a risk factor at a more systemic level. Voices from Care Cymru argued that poverty puts young people at risk of experiencing poor health outcomes, educational attainment and social exclusion, which in turn puts them at risk of marginalisation.⁴⁰⁵ The British Psychological Society, meanwhile, argued that poverty stretches the capacity of services to provide support to vulnerable people.⁴⁰⁶ For Estyn and the Children’s Legal Centre Wales, children from poorer backgrounds are more likely to be excluded from education, which is an important protective factor for vulnerable children, as we discuss above.⁴⁰⁷

Children who have experienced trauma or neglect in the home

273. It is not only children with care experience who experience trauma or neglect.⁴⁰⁸ Family instability was consistently reported to us as a significant risk factor for children: the Jay Review quoted evidence it had received which called trauma “a golden thread” in the lives of exploited children.⁴⁰⁹ Voices from Care Cymru’s submission expanded on why this might be the case:

“Children experiencing trauma in the home, such as abuse, neglect, or domestic violence, are also at heightened risk of exploitation. Trauma can impact a child’s sense of safety, self-esteem, and ability to trust others, making them more susceptible to manipulation and coercion by perpetrators.”⁴¹⁰

⁴⁰¹ [Written evidence, CYPM13 CASCADE, Cardiff University](#)

⁴⁰² [Written evidence, CYPM30 Children’s Legal Centre Wales](#)

⁴⁰³ [Written evidence, CYPM12 Association of School and College Leaders Cymru](#)

⁴⁰⁴ [Written evidence, CYPM25B Action for Children](#)

⁴⁰⁵ [Written evidence, CYPM14 Voices from Care Cymru](#)

⁴⁰⁶ [Written evidence, CYPM29 British Psychological Society \(BPS\)](#)

⁴⁰⁷ [Written evidence, CYPM30 Children’s Legal Centre Wales](#); [Written evidence, CYPM20 Estyn](#)

⁴⁰⁸ Children, Young People and Education Committee, ‘[Findings of engagement activities](#)’, September 2024, page 3

⁴⁰⁹ Jay, A. et al, ‘[Shattered lives, stolen futures. The Jay Review of Criminally Exploited Children](#)’, March 2024, page 19

⁴¹⁰ [Written evidence, CYPM14 Voices from Care Cymru](#)

274. Family instability and neglect was a key theme amongst the Senedd's Citizen Engagement Team's work with young people and parents with experience of criminal exploitation. Some participants spoke about their mothers, in particular, who did everything they could to support them despite limited resources. Others, however, described environments where parents, sometimes struggling with substance abuse or mental health issues, failed to provide necessary care and attention:

"Too many kids are left on the streets all day, putting them in the spotlight. It's the kids out there unsupervised who get noticed. People can tell their parents don't really care."⁴¹¹

275. Another participant recounted their experience with instability and lack of care during their teenage years:

"When I was 16, I was put in a hostel. I was responsible for myself but shouldn't have been. I should have been a looked-after child, but social services never helped me. I had all of the responsibilities of being older but none of the freedoms. I had to pay rent, put food in my freezer, I had to keep my room clean, I had to do my washing - that's a lot of responsibility for a 16-year-old. From the age of 16 to 17, I don't remember a day when I wasn't depressed. I took drugs in the hostel, acid, ecstasy, 2CB, I ended up doing sniff in hostel - it was just a bad place for me."

The participants emphasised that children in these circumstances lack essential security and boundaries at home, with little to no accountability. They felt that this lack of structure makes it clear to exploiters that these children are unsupervised and at risk.⁴¹²

276. St Giles Trust told us that professionals working in county lines, sexual exploitation and extremism reported that Adverse Childhood Experiences (ACEs) were common across victims of all forms of exploitation.⁴¹³ Barnardo's Cymru submitted similar views, and added that children who grow up in the same homes as siblings who have gone missing or been exploited have often experienced the same traumas, and that "we miss an opportunity when we don't

⁴¹¹ Citizen Engagement Team, '[Children and young people on the margins: Engagement findings](#)', October 2024, page 6

⁴¹² Citizen Engagement Team, '[Children and young people on the margins: Engagement findings](#)', October 2024, pages 6-7

⁴¹³ [Written evidence, CYPM19 St Giles Trust](#)

undertake targeted prevention work with siblings.”⁴¹⁴ The Association of School and College Leaders Cymru agreed that trauma was a key risk factors for children going missing and being involved in criminal activities, and suggested that parents of children who go missing may struggle to implement positive parenting strategies, and which may have been absent for many years.⁴¹⁵ Dyfed-Powys Police also recognised the impact of ACEs in relation to marginalised children.⁴¹⁶

Children with experience of the criminal justice system

277. Some stakeholders highlighted that contact with the criminal justice system can push some children into exploitative situations. The Association of School and College Leaders Cymru urged us to consider the vulnerability of children whose parents are in prison or involved in anti-social behaviour.⁴¹⁷ Voices from Care Cymru explained that:

“... Children with incarcerated parents face numerous challenges, including stigma, emotional distress, and disruptions to family life. They may experience difficulties in maintaining relationships with their incarcerated parent, coping with the financial and practical impacts of imprisonment, and accessing support services. Concerns may arise regarding the lack of targeted support for these children and the need for greater recognition of their unique needs within policy and practice.”⁴¹⁸

278. The Jay Review found that involvement in the youth justice system is both a consequence and a cause of criminalisation, identifying previous contact with the youth justice system – even for minor, unrelated offenses - is a risk factor for later exploitation. The review explained that children with family connections to gangs through peers, siblings or family members also face an increased risk, and struggles to break free from recurring patterns of offending.⁴¹⁹ Bridgend County Borough Council and the Children’s Legal Centre Wales shared similar concerns, with the latter adding that children who have contact with the youth justice

⁴¹⁴ [Written evidence, CYPM21 Barnardo’s Cymru](#)

⁴¹⁵ [Written evidence, CYPM12 Association of School and College Leaders Cymru](#)

⁴¹⁶ [Letter from Policing in Wales to the Chair of the Children, Young People and Education Committee](#), 23 August 2024

⁴¹⁷ [Written evidence, CYPM12 Association of School and College Leaders Cymru](#)

⁴¹⁸ [Written evidence, CYPM14 Voices from Care Cymru](#)

⁴¹⁹ Jay, A. et al, ‘[Shattered lives, stolen futures. The Jay Review of Criminally Exploited Children](#)’, March 2024, page 21

system are “some of the most vulnerable, with the most complex needs in society.”⁴²⁰

Children facing systemic discrimination

279. Some stakeholders felt that children who face discrimination are at heightened risk of marginalisation. Cymorth Cymru highlighted that many LGBTQ+ children are at risk of sexual abuse. It also reported that they can experience family breakdown and even physical abuse by family members because of their sexuality. These children can also distrust services and experience systemic barriers within services (such as sex segregated programmes and practices), which can lead to increase isolation, vulnerability and potentially exploitation.⁴²¹

280. Voices from Care Cymru raised similar concerns about some children from minority ethnic backgrounds, who may experience discrimination that isolates them from support services, such as the education system.⁴²² The Children’s Legal Centre Wales reported the Jay Review’s conclusion that black children continue to be overrepresented across all forms of exploitation.⁴²³ St Giles Trust explained that parents of exploited children from minority ethnic groups may be reluctant to involve authorities, fearing that the response they receive will be judgmental and punitive.⁴²⁴ Speech and language therapist Emma Baldwin highlighted in her written evidence that children from gypsy, Roma and traveller communities, who she argued are “often forgotten” by support services.⁴²⁵

Other risk factors

281. Some other risk factors were raised less frequently across the evidence we received, including:

- Children struggling with their mental health. The Jay Review explained that exploiters “often target those with poor emotional wellbeing, stemming from neglect, abuse, bullying or bereavement”.⁴²⁶ During our

⁴²⁰ [Written evidence, CYPM11 Bridgend County Borough Council](#); [Written evidence, CYPM30 Children’s Legal Centre Wales](#)

⁴²¹ [Written evidence, CYPM31 Cymorth Cymru](#)

⁴²² [Written evidence, CYPM14 Voices from Care Cymru](#)

⁴²³ [Written evidence, CYPM30 Children’s Legal Centre Wales](#)

⁴²⁴ [Written evidence, CYPM19 St Giles Trust](#)

⁴²⁵ [Written evidence, CYPM2 Emma Baldwin, Speech and language therapist](#)

⁴²⁶ Jay, A. et al, ‘[Shattered lives, stolen futures. The Jay Review of Criminally Exploited Children](#)’, March 2024, page 19. See also: [Written evidence, CYPM13 CASCADE, Cardiff University](#); [Written evidence, CYPM20 Estyn](#); [Written evidence, CYPM21 Barnardo’s Cymru](#); [Written evidence, CYPM28 National Youth Advocacy Service Wales \(NYAS Cymru\)](#);

stakeholder events, some professionals raised concern about waiting lists for mental health services, or the lack of support services for children who have experienced trauma arising from their exploitation.⁴²⁷ Mental health problems are also associated with many of the other risk factors explored in this chapter, as noted above.

- Children who, or whose parents, have alcohol or substance abuse problems.⁴²⁸

Our view

Children not in an education setting

282. We acknowledge the overwhelming evidence that we have received indicating that children who are excluded from education settings or placed on part-time timetables for extended periods of time are at a significantly higher risk of going missing or being criminally exploited. We also heard reference to children who frequently don't attend school, despite being a registered pupil – sometimes referred to as 'unofficial exclusions'. We were struck by the testimonies of frontline workers who told us that, with very few exceptions, all of the children that they work with do not regularly attend school. And we were also convinced by the views of the young people who spoke to the Senedd's Citizen Engagement Team who highlighted the inherent dangers of forcing vulnerable children out of schools, leaving them at risk of being exploited by predatory gangs.

283. However, we also recognise the challenges that schools face as they try to keep our most vulnerable children in school. We note the evidence we have heard about antisocial behaviour, including violence, towards other pupils and school staff. We do not underestimate how hard that must be for schools as they balance the needs of the individual child with those of the wider school community.

284. We believe that the Welsh Government could do more here to help schools, both by making the risks of exclusion clear in guidance, and by supporting schools to develop approaches that keep vulnerable children attending. To address the former, schools' exclusion guidance should be updated to better reflect the wider risk factors and consequences of exploitation, as explored in this report. And for the latter, the Welsh Government should work with local

⁴²⁷ Children, Young People and Education Committee, '[Findings of stakeholder events](#)', September 2024, page 20

⁴²⁸ Jay, A. et al, '[Shattered lives, stolen futures. The Jay Review of Criminally Exploited Children](#)', March 2024, page 24; [Written evidence, CYPM11. Bridgend County Borough Council: Written evidence, CYPM25B Action for Children](#)

authorities to identify and share best practice approaches to keeping at-risk children in school, which should form part of the wider training and awareness raising package offered to school staff across Wales.

Recommendation 17. The Welsh Government should update exclusion guidance for schools to reflect the wider risk factors of exploitation, as explored in this report, and ensure all schools are reminded of the potential consequences of exclusion and part-time timetables. Concurrently, the Welsh Government should work with local authorities to develop a bank of examples of where schools have successfully supported vulnerable children to remain in school, sharing those case studies to inform best practice across the sector.

285. We received strongly worded evidence from some arguing that children who are home educated are not at risk of criminal exploitation. Others, such as Welsh Local Government Association and the Association of School and College Leaders Cymru, felt that some home educated children *may* be vulnerable.

286. This inquiry has not focused on children whose parents choose to educate them at home and who, in doing so, deliver an appropriately broad and balanced curriculum within a caring and nurturing environment outside a formal education setting. We have no reason to believe that these children are at any greater risk of exploitation than children who receive their education at school.

287. We understand that the debate surrounding the proposed children missing education database extends beyond the terms of reference of this inquiry. Our concern here is children who are at risk of going missing, being criminally exploited or other harms. We have received overwhelming evidence that these children are highly likely not to attend school. These children, we have heard, have usually been excluded, placed on reduced timetables, or may refuse to attend school for other reasons. We believe that the Welsh Government's proposed database offers an opportunity for local authorities and other relevant agencies to safeguard *these children*, whose extreme vulnerability warrants a proportionally robust safeguarding response.

Recommendation 18. The Welsh Government should explore and report back to us within six months on the use of the children missing education database for local authorities to identify and safeguard children who are not in education settings and who may, consequently, be at risk of exploitation.

Care experienced children

288. Although children in care may be overrepresented in statistics about missing children, it is clear that they *are* disproportionately likely to go missing compared to children who are not in care. Going missing places them at risk of further harm, including exploitation and abuse. And because of the trauma that many care experienced children have experienced, and because they may not have consistent and loving support structures around them, they are particularly vulnerable to exploitative behaviour.

289. Since we released our report on the care system in May 2023 the Welsh Government has launched its Corporate Parenting Charter. This charter was the Welsh Government's answer to calls for clearer corporate parenting responsibilities for a wider group of public bodies. We had recommended specific statutory corporate parenting duties for a range of public bodies. The Welsh Government rejected our recommendations.

290. We have received no evidence to suggest that the charter has led to tangible improvements in the quality of services for care experienced children and young people. In fact, we have found during this inquiry the same fundamental challenges for care experienced children as we discovered during our inquiry into the care system more widely: challenges around placement quality, exclusion from schools, the threat of homelessness, and the impact of poor multi-agency working and the implications of social care workforce challenges.

291. As we concluded in our 2023 report, good practice for how statutory bodies deliver services to children looked after and accommodated children is already set out in statutory guidance. The problem, as the Welsh Government itself acknowledged during oral scrutiny, is that what's actually happening does not always resemble that good practice. So the Welsh Government cannot be surprised if a voluntary charter does not drive the consistency of practice that even statutory guidance has so far failed to achieve.

292. Corporate parents' duties must be given a firmer footing, not weakened. More consistent across Wales, not left to each individual body to set out for itself. Legally enforceable, not voluntary. We continue to believe that placing clear corporate parenting duties in law is the best way to drive improvements within the care sector. We ask the Welsh Government to set out to what consideration it has given to do so as part of its reflections on public bodies' response to its voluntary charter.

Recommendation 19. In its response to this report, and having reflected on the impact (or otherwise) of the voluntary Corporate Parenting Charter on the quality and consistency of services for care experienced children and young people, the Welsh Government should set out:

- what consideration it has given to placing its Corporate Parenting Charter on a statutory footing; and
- any further action it intends to take in relation to corporate parenting, and the timelines for doing so.

293. In the context of a care system which so clearly needs significant – radical – reform to truly deliver for children and young people, we were heartened to hear positive feedback from a young person, a foster carer and from local authority staff about Denbighshire County Council’s digital platform for children in care.

294. We understand that it is for each local authority to determine the practicalities of how they communicate with children and young people. But we sense that this platform touches on issues that are fundamentally important to all children, particularly to those in care. It gives them more control over how and with whom they communicate, as well as being a useful and practical safeguarding tool. We therefore ask the Welsh Government whether it has considered funding innovations such as Denbighshire’s app for national rollout, and if not whether it would consider doing so.

Recommendation 20. In its response to this report, the Welsh Government should set out:

- what support it has provided to local authorities to help them drive/adopt digital innovations that improve communication with children in care; and
- whether it considers that the app used in Denbighshire (or similar platforms used elsewhere) might warrant further investigation, with a view to rolling them out across local authorities nationwide.

Unaccompanied asylum seeking children

295. We recognise that unaccompanied asylum seeking children are amongst the most vulnerable children in Wales. They often share many of the risk factors that we have explored in this chapter: experience of trauma, lack of supportive

structures, inconsistent school attendance, and communication challenges, to name just a few. These are compounding risk factors that place unaccompanied children at heightened risk of being exploited or abused.

296. We have heard consistent calls for a National Guardianship Service for unaccompanied children to support them to settle into their new lives and to navigate complex legal immigration processes. We do not feel that we have taken enough detailed evidence to come to firm conclusions about whether or not we support such a service, and what form that service might take. But we are struck by the delays in the Welsh Government's progress in this area: from what we can see, very little, if any, tangible progress whatsoever has been made since 2017, when the then Welsh Government told a Senedd Committee much the same things that they are telling us in 2024. We ask the Welsh Government to provide us with a full update on its work in this area, with clear information about how and when it will move forward.

Recommendation 21. In its response to this report, the Welsh Government should set out clearly what progress it has made in establishing a National Guardianship Service for unaccompanied asylum seeking children, and how and by when that work will progress.

Neurodivergent children and children with learning disabilities

297. Neurodivergent children and children with learning disabilities have been raised regularly throughout our inquiry by a range of stakeholders working with marginalised children. The challenges that many children face when interacting with public services and society more widely as a consequence of their neurodivergence or disability, combined with the reduced ability of some children to identify when someone is exploiting them, make them an overrepresented group of missing and exploited children.

298. We do not believe that the full extent of the scale of exploitation of neurodivergent children and children with learning disabilities is well-enough understood. Without that understanding the Welsh Government and other responsible bodies cannot hope to put in place interventions to stop it happening. We urge the Welsh Government to address that information shortfall as a critical first step to safeguarding these children.

Recommendation 22. The Welsh Government should take immediate action to better understand the nature and scale of exploitation of neurodivergent children and children with learning disabilities, with a view to working alongside relevant

agencies to develop a more effective response to safeguarding these groups of children.

Children living in poverty

299. It will be no surprise to anyone who works with vulnerable people to hear that poverty is often a key driver of their life experiences. Yet despite it being perhaps the foundation of marginalisation and the backdrop to exploitation and abuse, poverty is often not given the attention it deserves. We understand why that might happen. The causes and remedies of poverty is a debate that extends far beyond the issues we explore here. But, like our 2023 report into the care system, it would be remiss of us not to stress this key conclusion: poverty drives and feeds exploitation. It is fundamentally and inherently embedded into the context surrounding the shocking issues we have explored in this report.

300. Whenever the Welsh Government is challenged on its achievements on poverty we are met with a similar response: the Welsh Government lists the actions that it is taking, but states that fundamentally the levers to tackle poverty lie with UK Government. And that is true, to a certain extent. But that will be of little comfort to the many children and young people living in poverty here in Wales. We therefore ask the Welsh Government to acknowledge its responsibility in relation to poverty in the context of the distressing and harrowing work we have undertaken over the course of this inquiry.

Recommendation 23. The Welsh Government should acknowledge:

- the fundamental and inherent links between poverty and the abuse and exploitation of children;
- that, despite the most powerful levers for addressing poverty lying elsewhere, it *does* have powers to provide support and to safeguard children who are made vulnerable as a result of poverty, and should rightly be held to account for its successes and failures in doing so.

Annex 1: Engagement activities

The Committee contacted key stakeholders in summer 2024 to ask for support in facilitating engagement visits with front-line professionals, children, and policy experts. We accepted as many engagement opportunities as our forward work programme allowed.

Date	Host organisation/event	Summary of engagement activity
27 June 2024	Barnardo's (Rapid Response team) Newport	Roundtable discussion with staff employed by Barnardo's as part of their Rapid Response team and Newport City Council staff to support families in crisis. Meeting with a child currently being supported by the Rapid Response team.
27 June 2024	NYAS Cymru ('Missing the Point' steering group meeting) Cardiff	Roundtable discussion as part of 'Missing the Point' steering group meeting. Involved staff from NYAS Cymru, Council for Wales of Voluntary Youth Services (CWVYS), The 4Cs, the Children's Commissioning Consortium Cymru, The Children's Society, Media Academy Cymru (MAC), as well as care experienced children, a foster carer and residential care home manager.
27 June 2024	Vale of Glamorgan Council Barry	Roundtable discussion with council and Youth Justice staff and frontline support workers.
8 July 2024	Action for Children Virtual	Online discussion with Action for Children UK staff.
10 July 2024	Hillside Secure Children's Home Neath	Tour of the home, including discussion with care home staff and children at the home. Presentation and roundtable discussion with care home staff and representatives

Date	Host organisation/event	Summary of engagement activity
		from Neath Port Talbot Council Education Department and Neath Port Talbot Council Children's Services.

Annex 2: List of attendees at stakeholder events

15 May 2024 (missing children)

Organisation	Name(s)
ADSS	Rachel Hawkins Chris Frey-Davies
Action for Children	Sharon Maciver Stuart Barter Gary Bowen-Thomson Lee Bridgeman Hefin Daniels Wynne Randles
CASCADE	Nina Maxwell
Children's Society	Tom Davies
GISDA	Lyndsey Thomas
Llamau	Yvonne Connolly Emma Evans
NYAS	Sharon Lovell Johanne Jones Phoebe White
St Giles	Lee Dutton Evan Jones

19 June 2024 (criminalised children)

Organisation	Name(s)
Action for Children	Lee Bridgeman Gary Bowen Thompson
ADSS	Anneka Bartlett Rachel Hawkins Chris Frey-Davies Toni Andrews
Barnardo's	Leah Ward
CASCADE	Nina Maxwell

Organisation	Name(s)
Children's Commissioner for Wales	Rachel Thomas
Children's Society	Tom Davies Holly Sayce
Powys County Council	Ruth Cross
Cardiff City Council Safeguarding Adolescents from Exploitation (SAFE) Team	Steph Mckay Gabi Bazzerra
Llamau	Emma Evans
NYAS	Rob Hill Sarah Jane Davies Phoebe White
St Giles	Lee Dutton Evan Jones
VFCC	Francesca Pritchard

Annex 3: List of oral evidence sessions

Date	Name and Organisation
20 March 2024	<p>Gillian Baranski, Chief Inspector, Care Inspectorate Wales</p> <p>Vicky Poole, Deputy Chief Inspector, Care Inspectorate Wales</p>
19 September 2024	<p>Jane Hutt MS, Cabinet Secretary for Social Justice, Trefnydd and Chief Whip</p> <p>Dawn Bowden MS, Minister for Children and Social Care</p> <p>Taryn Stephens, Deputy Director Social Services Improvement, Welsh Government</p> <p>Alistair Davey, Deputy Director Social Services Enabling, Welsh Government</p>

Annex 4: List of written evidence

The following people and organisations provided written evidence to the Committee. All Consultation responses and additional written information can be viewed on the [Committee's website](#).

Reference	Organisation
CYPM 01	Invalid
CYPM 02	Emma Baldwin, Speech and language therapist
CYPM 03	RAY Ceredigion
CYPM 04	Education Otherwise
CYPM 05	Individual
CYPM 06	Kelly Anderson
CYPM 07	Christian Education for Deeside
CYPM 08	Learning Disability Wales
CYPM 09	Individual
CYPM 10	Individual
CYPM 11	Bridgend County Borough Council
CYPM 12	Association of School and College Leaders Cymru (ASCL)
CYPM 13	Children's Social Care Research and Development Centre (CASCADE), Cardiff University
CYPM 14	Voice From Care Cymru
CYPM 15	Office of the Police and Crime Commissioner (Dyfed-Powys) (OPCC)
CYPM 16	Llamau
CYPM 17	Bevan Foundation
CYPM 18	The Children's Society
CYPM 19	St Giles
CYPM 20	Estyn

Reference	Organisation
CYPM 21	Barnardo's Cymru
CYPM 22	Paige Monaghan, Dr Sara Waring, Dr Susan Giles (University of Liverpool), and Dr Freya O'Brien (Liverpool John Moores University)
CYPM 23	Invalid
CYPM 24	Royal College of Speech and Language Therapists (RCSLT)
CYPM 25	Action for Children
CYPM 25B	Action for Children
CYPM 26	Welsh Local Government Association (WLGA)
CYPM 27	Welsh Women's Aid
CYPM 28	National Youth Advocacy Service Wales (NYAS)
CYPM 29	British Psychological Society (BPS)
CYPM 30	Children's Legal Centre Wales
CYPM 31	Cymorth Cymru
CYPM 32	Welsh Government

Additional Information

Title	Date
West Glamorgan Safeguarding Partnership	11 July 2024
Aneurin Bevan University Health Board	9 August 2024
Association of Directors of Education in Wales	23 August 2024
Policing Wales	23 August 2024
Hywel Dda University Health Board	23 August 2024
Powys Teaching Health Board	23 August 2024
Cwm Taf Morgannwg University Health Board	30 August 2024
Royal College of Speech and Language Therapists	13 September 2024
National Youth Advocacy Service Wales (NYAS)	19 September 2024