

BW 11

Ymchwiliad i Fudd-daliadau yng Nghymru: opsiynau i'w cyflawni'n well

Inquiry into Benefits in Wales: options for better delivery

Ymateb gan: Comisiynydd Plant Cymru

Response from: Children's Commissioner for Wales

To John Griffiths AM

Chair – Equality, Local  
Government and  
Communities  
Committee

11th April 2019

Dear Chair,

**Re: Inquiry into Benefits in Wales: options for better delivery**

**By email only**

Since my time as Commissioner I have consistently highlighted that child poverty is one of the biggest challenges facing children in Wales.

Over the last two years I have called for concrete steps from Welsh Government to make a positive difference to children living in poverty here in Wales.

In my [2016/2017 Annual Report](#) I called on Welsh Government to use “*all available levers to alleviate child poverty.*”

During the last year I have undertaken a significant piece of work involving over 550 over children and young people across school and community settings, ranging in age from 5 to 21. I also took into account the survey responses of nearly 300 parents/carers and workshops and conversations with around 20 parents/ carer, as well as over 40 professionals working with children and young people in poverty, including teachers, health professionals, play workers and representatives of third sector organisations.

The report I published [A Charter for Change: Protecting Welsh Children from the impact of poverty](#) urged Welsh Government to produce a Child Poverty Delivery Plan focusing on concrete and measurable steps to address child poverty in the short and medium term. There was a focus on the practical changes that can be made here in Wales as the UK Welfare system does not directly sit within my remit. However inevitably the impact of benefit changes was raised during conversations during the course of this work.

My report also urges Welsh Government to explore with local authorities how they can help ensure that those children who are entitled to receive support such as free school meals and additional funding for the costs of school uniforms via the PDG access grant,

potentially by introducing an opt out rather than opt in system. I point to the example of Glasgow City Council who have awarded payments of their school uniform grant automatically to families on the basis of eligibility for housing benefit and council tax information which local authorities in Wales also hold and use to request that schools contact their parents/ carers to opt-in. A full list of the recommendations can be found in the Annex of the [report](#).

In November 2017 myself and the other UK Children's Commissioners wrote to the Chancellor of the Exchequer to express our concerns about universal credit and measures under welfare reform including; the two child limit, and the benefits freeze. No response issued from the Chancellor and my discussions with Ministers in the Wales office have not yielded any further concrete changes either.

As you will be more than aware the First Minister acknowledged the importance of taking steps to relieve child poverty in Wales in his leadership manifesto including taking action in respect of Free school meals and holiday provision to address food security. I will continue to seek assurances from the First Minister and other Government Ministers throughout this Assembly term that these and other opportunities to address child poverty here in Wales are being proactively pursued.

It is for these reasons that I welcome this Committee's inquiry into the options for better delivery of benefits in Wales. I noted with interest the First Minister's comments in First Minister's Questions on Tuesday 19<sup>th</sup> February, indicating his interest in properly exploring the devolution of the administration of welfare benefits.

I have no specific expertise in the administration of welfare benefits, and the welfare system sits outside my legal remit, so I have not commented further on the details of how any proposed changes could work for that reason. I would however welcome the ongoing discussions in Wales to tackle the very real and pressing issue of child poverty.

On Monday 8<sup>th</sup> April 2019 I published my new [three year plan](#) for the final three years of my term as Commissioner. Within this one of my ambitions is to see Wales by 2022 as "a country whose government has taken new steps to reduce child poverty and its impact". The plan notes the findings in relation to poverty from my [2018 evidence review](#) - "Unless changes are made to eligibility rules for free school meals and implementation of Universal Credit, the prospect for child poverty in Wales are very likely to worsen". I will continue my policy and influencing work in this area in earnest, but the welfare system is currently beyond my legal remit in this regard while it remains non-devolved.

Finally, as the Inquiry progresses I would urge the Committee to engage with members of the public with direct experience of the benefits system, to understand the key challenges and barriers that exist in the current system. I would also encourage the Committee to actively engage with children and young people, who often have a very clear view on the changes they wish to see and can come up with some excellent creative and innovative solutions to challenges faced by our public services.



Yours Sincerely



Sally Holland  
Comisiynydd Plant Cymru  
Children's Commissioner for Wales