

## Annex

# Proposal for the registration of youth workers with the Education Workforce Council: Full list of respondents and published responses

### List of respondees

<u>Name:</u>	<u>Organisation:</u>
Stacey Olsson	Newport Youth Service
Lee Patterson	Cardiff Youth service
John Heffernan	Tanyard Youth Project
Members of the group	Youth Work Reference Group
Amanda Bell	Flintshire County Council
Gerard E Kerlake	Estyn
Kenneth Muir	Organisation: General Teaching Council for Scotland (GTCS)
Dominic MacAskill	UNISON Wales
Bev Williams`	Alison House Youth & Play Project
Gill Adams	Carmarthenshire Youth Support Service
Hayden Llewellyn	Education Workforce Council (EWC)
Steven Gow	Flintshire County Council
Kirsty Gloyne	Glyndwr University Youth & Community Student
H T Lloyd	Carmarthenshire County Council – Youth Support Services
Rev Dr Philip Manghan	Catholic Education Service
Rebecca Williams	UCAC (Undeb Cenedlaethol Athrawon Cymru)
Chris Keates (Ms)	NASUWT Cymru
Rev Dr Gareth Edwards	Evangelical Movement of Wales
Catrin James	Urdd
Andy Borsden	Organisation: Wales Principal Youth Officers' Group (PYOG)
Alison Mawby	Organisation: KPC Youth & Community
Tim Pratt	ASCL Cymru (Association of School & College Leaders)
Helen Hardwick	The Salvation Army

## Annex

<b>Name:</b>	<b>Organisation:</b>
Paul Glaze	CWVYS
Nigel Sheppard	Merthyr Tydfil Youth Service
Rachel Burton	WEA YMCA Community College Cymru / Glenwood Community Church
Professor Sally Holland	Organisation: Children's Commissioner for Wales
Rob Williams	Organisation: NAHT Cymru
Grant Poiner	Organisation: Boys' and Girls' Clubs of Wales
David Greatorex	The Christian Institute
Mary van den Heuvel	ATL Cymru
Helen Kneale	Glyndwr University/ Wrexham Youth Service
Jess Achilleos	Organisation: Wrexham Glyndwr University
Gareth Newton (Chair)	Education and Training Standards (ETS) Wales
Dan Boucher	Christian Action Research and Education
Sian Davies	Llanharan Community Development Project Ltd
Andrew Mckay	DONE IT ALL
Elaine Williams	Mid and West Wales Fire and Rescue Service
Dave Sommerville	DofE Award, Pembrokeshire Youth Services
Alexandra Atkins	Swansea Carer Centre
Alan Lansdown	Evangelical Movement of Wales/ Hebron Hall Christian Conference Centre / Zone Trustee of the Gideons International

## Annex

### Published responses

Below are all the responses from the respondents who have agreed for their comments to be published. These responses are published in the language that they were received in.

CR01

Name:

Organisation:

**Question 1-** Do you agree that widening professional registration to include the Youth Worker sector would contribute to improving the quality of service provided to young people in Wales?

*Agree*

**Supporting Comments**

*Yes, it will enable young people to develop holistically, working with them to facilitate their personal, social and educational development, to enable them to develop their voice, influence and place in society and to reach their full potential.*

**Question 2 -** Do you agree that registration of the two roles (as set out in paragraph 6.2) in the first instance, will ensure the quality and professionalism of individuals employed as youth workers and protect their title and status?

*Agree*

**Supporting comments**

*Having knowledge from past qualifications will be able to enhance the provision of supporting schools, colleges and local authority and to ensure each individual receive the best support to fulfil their potential.*

**Question 3 –** We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

---

CR02

Name:

Organisation:

## Annex

**Question 1-** Do you agree that widening professional registration to include the Youth Worker sector would contribute to improving the quality of service provided to young people in Wales?

Agree

### **Supporting comments**

*I have worked for the local authority for almost 12 years and am currently studying toward my level 6 BA Hons Youth and Community degree at Cardiff Metropolitan University. I work full time for the local authority as part of a team that offers a drop in support service for any Young Person aged 16-25 years. I am also part of the newly established multiagency central hub, Early Help Team. I very strongly agree that widening professional registration to include the Youth Worker sector would contribute greatly to improving the quality of service which is provided to young people in Wales. In my working career so far I have encountered many youth workers who have supported young people from diverse backgrounds with highly intensive needs on all levels and have saved lives by utilising their youth work professional values, attitudes and beliefs to help individual young people. It is a long time overdue and about time that the work delivered by professional youth workers is at last recognised for the vital, relevant and important role played within young people's lives. Registration will ensure professionalism, consistency and standardisation in the quality of learning delivery in Wales. Registration of Youth Work will also distinguish how individuals define their role as either a 'Professional Youth Worker'; or a 'Youth Support Worker', both of which are defined within the level of qualification individuals hold.*

**Question 2 –** Do you agree that registration of the two roles (as set out in paragraph 6.2) in the first instance, will ensure the quality and professionalism of individuals employed as youth workers and protect their title and status?

Agree

### **Supporting comments**

*Following recent government financial cut backs I do believe that this has had an impact to young people services within Wales. However, in my opinion and experience, youth workers have remained consistent, committed and dedicated to delivering a high standard of service to young people in a time of such uncertainty. By recognising youth workers as professionals and protecting this title and status can only be seen as a positive way forward for the profession and hopefully encourage more employees/volunteers who work with young people to participate in the training and career development.*

**Question 3** We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

---

## Annex

### CR03

Name: Stacey Olsson

Organisation: Newport Youth Service

**Question 1** Do you agree that widening professional registration to include the Youth Worker sector would contribute to improving the quality of service provided to young people in Wales?

*Agree*

#### ***Supporting Comments***

**Question 2** Do you agree that registration of the two roles (as set out in paragraph 6.2) in the first instance, will ensure the quality and professionalism of individuals employed as youth workers and protect their title and status?

*Agree*

#### ***Supporting comments***

**Question 3** We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

---

### CR04

Name: Lee Patterson

Organisation: Cardiff Youth service

**Question 1** Do you agree that widening professional registration to include the Youth Worker sector would contribute to improving the quality of service provided to young people in Wales?

*Agree*

#### ***Supporting comments***

*Yes I agree with the proposal as I believe it will enhance the professional status of Youth Work and thus enable workers to continue to deliver in a range settings both formal and non-formal.*

## Annex

**Question 2** Do you agree that registration of the two roles (as set out in paragraph 6.2) in the first instance, will ensure the quality and professionalism of individuals employed as youth workers and protect their title and status?

*Agree*

**Supporting comments**

*Registration of both roles is essential to keep the parity between the two roles, especially due to the fluid funding situation workers find themselves in i.e. potentially switching between full and part time contracts.*

*We need to ensure that Youth Workers who currently have professional status by completing level 5 Youth and Community Work are able to attain the registration.*

**Question 3** We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

---

CR05

Name:

Organisation:

**Question 1** Do you agree that widening professional registration to include the Youth Worker sector would contribute to improving the quality of service provided to young people in Wales?

*Disagree*

**Supporting comments**

*As a professional youth worker (JNC), I work with young people using non-formal learning methods which, by its definition, are hard to quantify.*

*I envisage organisations requesting JNC youth worker where they really wouldn't be necessary, and vice versa. I see this leading to a two tier system of provision that would have a detrimental impact on young people and the opportunities afforded to them. .*

**Question 2** Do you agree that registration of the two roles (as set out in paragraph 6.2) in the first instance, will ensure the quality and professionalism of individuals employed as youth workers and protect their title and status?

*Disagree*

## Annex

### **Supporting comments**

*There needs to be a lot more work on the definition of a 'Youyth Worker' and the responsibilities of a person employed in such a role which I believe would be impossible to do.*

*I can understand the logic in registering Local Authority 'Youth Worker' as their role is very specific. But where, and how, can the line be drawn between a youth worker and youth pastor at church (who provide much the same service) or someone working with young people with drug problems or someone providing summer activities? The role is too broad. It must be remembered that youth workers don't necessarily have the job title 'Youth Worker' with hundreds of variations that would be unmanageable to quantify.*

*I currently work young people organising and managing a holiday residential service, will these workers need to be registered? I believe the whole area of youth work will be too 'grey' to manage. This is the whole reason this has been an impossible job to do before now and I don't think the term youth worker will ever be able to be defined.*

*There are many JNC youth workers doing youth work under a different job title, like myself, that wouldn't be 'protected' or 'valued' under this registration and conversely there are very competent, experience and professional people working as 'Youth Workers' who would be unvalued and deterred from hierarchical profession.*

**Question 3** We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

*From a young person centred perspective I don't believe this will have any beneficial impact on their development. The only change I can see from their perspective is a reduction in valuable projects split into two tier 'registered' and 'unregistered' service.*

*The proposal is aimed at registering professionals who work with young people in a non formal setting which is hard to define and, I believe, would be impossible to implement.*

*I can understand the desire to make 'youth worker' a protected title but not a requirement in registration.*

---

CR06

Name:

Organisation:

## Annex

**Question 1** Do you agree that widening professional registration to include the Youth Worker sector would contribute to improving the quality of service provided to young people in Wales?

*Agree*

**Supporting comments**

*Having a professional registration would ensure appropriate levels of training and support was provided for Youth Workers, who have a huge impact on young peoples lives. It would also give youth workers the recognition for the work they do and for other professionals to understand the responsibilities of Youth workers.*

**Question 2** Do you agree that registration of the two roles (as set out in paragraph 6.2) in the first instance, will ensure the quality and professionalism of individuals employed as youth workers and protect their title and status?

*Agree*

**Supporting comments**

*I agree with the registration of both roles, and feel it would protect their title and status, ensuring professionalism within Youth Work is understood.*

**Question 3** We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

*I have been a youth worker in a number of different settings for a number of years, and feel undermined by other professions. There is a lack of respect by some services, and an imbalance in professional opportunities, support and pay. I feel by registering Youth Workers, it will allow for a more professional approach to peoples work, and a better respect for the services provided by Youth Workers*

---

CR07

Name: John Heffernan

Organisation: Tanyard Youth Project

*As a concept this is a great idea, it could mean recognition and respect for professionals who play a vital role in society and the lives of young people and with the proper recognition could play an even bigger role. After all we are the purest front line service as young people choose to voluntarily engage. Good training and guidance for workers that was uniform across Wales would raise standards and make recruitment and management of staff easier.*

## Annex

*Here is the but and however*

*This proposal could at best be called insulting, short sighted and misses the point entirely*

*1) Registration of youth workers will do nothing to increase the recognition of the profession. That will remain arbitrary until Welsh Government gives it full backing and here I am talking ring fenced funding and if it is really serious a national youth agency/service. Until then we will always be seen as the poor cousin by teachers and social workers. I have friends who are teachers and social workers and despite the fact that they have never had to talk a young person out of killing themselves they still think I just play pool. We are not very good as a profession at talking up what we do. This would be a good first step and ring fenced funding would be a massive stride towards this.*

*2) The current qualification for youth work is not fit for purpose and possession of one counts for very little. How often have perfectly competent and experienced workers done a degree to become regarded as professional? I have spoken to many who said it has not improved their practice just gave them better job security and a higher salary. Both good reasons for the participant and yet make no difference to the young people they work with. How many workers out there have not done a degree and are perfectly competent. It is also absurd in terms of length. There is no fast track option, on the job top up training and recognition of experience. I would not be able to register as a qualified youth worker despite 15 years of experience (7 as the manager of a project) and a 2.1 Honours B.Sc in Criminology. It would take me three years full time to become a 'professional' youth worker and two years full time to become a qualified primary school teacher. This is insane. As a qualified youth worker I could expect to earn between £15K and £18K as a starting salary, well below the equivalent for a teacher or social worker. That is of course if I could find a job, which is becoming increasingly more difficult. This last point brings us back to ring fenced funding.*

*3) The reality is the council run youth services are more likely to be able to provide work force development for their workers. This then creates a situation where an organisation such as mine could be called 'unprofessional'. This would be of huge detriment in bidding for contracts and applying for grants. If the funds and suitable courses are created for a parity of education and work force development opportunities between the two sectors then it would be reasonable to expect an organisation to have 'professionals' or people working towards it. Here we are again at a national youth work agency and ring fenced funding.*

*4) Anyone who had the choice of engaging with a 'professional' or non professional individual or organisation would naturally gravitate to the professional. In this case however professional does not mean better. There are however people within organisations who would use this to protect their own organisations at the cost of others. I would have a huge concern over councils doing this to organisations such as mine.*

## Annex

5) *What would the National Lottery do? They aren't the brightest at the best of times and if they adopted this 'professional' standard then a lot of organisations would be out of business. This same question can be raised at all funders.*

6) *I would fear for an organisation such as mine in the current funding and political climate if these proposals were carried out. These proposals say that the Tanyard is not professional. This is insulting to everyone who has ever given blood sweat and tears to the place. It is also insulting to the high numbers of young people who access it for activities and support.*

7) *I would fear for the careers of myself and my employees in the current funding and political climate if these proposals were carried out. This proposal says that I am not professional. This is slander and discrimination and an insult to the last 15 years of my life.*

8) *National Youth Service and ring fenced funding, without these you are just pissing in the wind.*

**Question 1** Do you agree that widening professional registration to include the Youth Worker sector would contribute to improving the quality of service provided to young people in Wales?

*Disagree*

### **Supporting comments**

**Question 2** Do you agree that registration of the two roles (as set out in paragraph 6.2) in the first instance, will ensure the quality and professionalism of individuals employed as youth workers and protect their title and status?

*Disagree*

### **Supporting comments**

**Question 3** - We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

---

CR08

Name:

Keith Towler	Chair of CWVYS
Andy Borsden	Chair of PYO Group

## Annex

Gareth Newton	Youth Work Alliance Group
John Heffernan	Youth Work Alliance Group
Nick Hudd	Youth Worker
Donna Dickenson.	ADEW
Tim Opie	WLGA
Daniel Marshall	Vale of Glamorgan Youth Mayor
Dai Bryer	Welsh Medium Strategic Youth Work Group
Gerard Kerslake	Estyn (observer)
Paul Glaze	CEO CWVYS (observer)
Graeme Tiffany	Academic (observer)
Howard Williamson	Academic (observer)
	Youth worker supporting youth mayor (observer)

Organisation: Youth Work Reference Group

**Question 1** Do you agree that widening professional registration to include the Youth Worker sector would contribute to improving the quality of service provided to young people in Wales?

*Agree 79%*

*Disagree 14%*

*Neither agree nor disagree 7%*

*(14 people voted)*

### Supporting comments

<b>Agree</b>	<b>Disagree</b>	<b>Neither</b>
<i>At a philosophical level this is a 'no-brainer'. Young people deserve professionally / valued and qualified workers.</i>	<i>Because there may be/ is plenty of 'quality' outside of qualifications.</i>	<i>Care needed in conflating professionalisms and professionalization uncertain can be professional.</i>
<i>Young people can scrutinise delivery (quality-accountability.)</i>	<i>Used by LAs to kick the voluntary sector.</i>	<i>I'm not sure how it assures quality – depends on the CPD framework that supports it.</i>
<i>There is a link between qualification and quality. Regulation is conferred upon those qualified.</i>	<i>Definition of professionalism is far too narrow.</i>	

## Annex

<i>Provides and element of equality with other professions.</i>		
<i>Setting standards of credibility.</i>		
<i>You have to meet certain standards to register/ achieve goals.</i>		
<i>Resources follow enhancing service provision.</i>		
<i>Professional registration would/ could result in better training opportunities for youth workers hence providing them a chance to provide a better service.</i>		
<i>Improves quality indirectly through removing from the register those unfit to practice.</i>		
<i>Safeguarding.</i>		

**Question 2** Do you agree that registration of the two roles (as set out in paragraph 6.2) in the first instance, will ensure the quality and professionalism of individuals employed as youth workers and protect their title and status?

Agree 43%

Disagree 36%

Neither agree nor disagree 21%

(14 people voted)

### **Supporting comments**

<b>Agree</b>	<b>Disagree</b>	<b>Neither</b>
<i>I would hope this would be the outcome – as why bother otherwise. Requires very good CPD framework and accountability.</i>	<i>This is based on wording of the question → registration in itself will not ensure the quality of the work is delivered 'i.e. the professionalism' this is a matter ensured through quality systems and line management performance management.</i>	<i>I would agree that this is a starting point; however registration will need to move on to cover the broader range of YW roles and organisations.</i>

## Annex

<i>There is a link between qualification and quality of work and registration. Registration is critical for equal status perceptions.</i>	<i>Parity is required across all sectors.</i>	<i>Uncertain of developments - not sure about 'professional youth worker' or 'youth support worker.'</i>
<i>It will ensure and protect their status as having a registration system will mean that all youth workers will be held with higher regard.</i>	<i>What is 'professionalism'? Is it a piece of paper or an attitude, or both?</i>	<i>Why not just demand JNC?</i>
	<i>Professionalism is not a function of registration. Registration can aim for exclusivity and title, but not necessarily status.</i>	<i>It very much depends if it is an intention to demand registrants to secure contracts.</i>
	<i>More registrations does not = quality nor professionalism.</i>	<i>Professionalism cannot be ensured with registration alone.</i>
	<i>No equality of training for LA and voluntary sector.</i>	
	<i>Impact on insurance in vol sector organisations.</i>	

**Question 3** - We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

- *Doesn't recognise professionalism, only recognises qualification.*
- *Will EWC replace ETS?*
- *Role of EWC in the provision and/ or quality of and/ or access to CPD?*
- *Clarity of voluntary sector and a danger of a 2 tier service to be addressed.*
- *Code of Practice for employers*
- *Link between regeneration and CPD*
- *Will it be an offence for LAs/schools to employ un-registered youth workers?*
- *Portability of registration- what happens when English/Scottish/Irish youth workers gain employment in Wales?*
- *Para 4.9 (of consultation doc) 'The values of youth work match the purpose of education...' – need to ask what education is before asking what it's for.*

## Annex

- *Lots of words need clarifying: resilience, capacity, confidence, competence, self-assurance.*
- *Is there a distinction between paid and unpaid 'voluntary' sector staff? Why would paid staff not be required to register and unpaid staff discretionary?*
- *Need to be mindful re contracts e.g. delivery by registered/non-registered youth workers.*
- *Should all local authority staff be registered – surely we should be aiming for this.*

---

CR09

Name: Amanda Bell

Organisation: Flintshire County Council

**Question 1** Do you agree that widening professional registration to include the Youth Worker sector would contribute to improving the quality of service provided to young people in Wales?

*Neither agree nor disagree*

### **Supporting comments**

*It would sort out the people who are genuinely interested in working with young people. But would also upset and turn away part time workers, what incentive would they have from this and we have a large number of part timers in the service. The service I feel is already offering a good standard of intervention with young people, however it is important to realise that much of the work with young people will be informal and this is what appeals to the young people we work with.*

**Question 2** Do you agree that registration of the two roles (as set out in paragraph 6.2) in the first instance, will ensure the quality and professionalism of individuals employed as youth workers and protect their title and status?

*Agree*

### **Supporting comments**

*I do agree and think we do need to be protecting the title of youth workers and the youth work profession may then have a more serious status. It is as in other services apparent that there are workers who may be doing the job for the money which does need to be addressed and would be if registration was introduced however what incentive would be offered to a contracted 3 hour a week worker have from the registration.*

## Annex

**Question 3** - We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

*Pay should be reflected in the registration process. Current youth work professionals should be brought into line with other professions and job opportunities might then be more widely considered. There should be more support from governing bodies to recognise the good work that youth workers are doing both full time and part time and part time and I feel that this has not been kept updated and in line with other professions*

---

CR10

Name: Gerard E Kerlake HMI

Organisation: Estyn

**Question 1** Do you agree that widening professional registration to include the Youth Worker sector would contribute to improving the quality of service provided to young people in Wales?

*Agree*

**Supporting comments**

*Registration will provide additional assurance to young people, their parents and the public, that an individual is fit to practice, over and above assurance already provided by the requirement for people engaged in 'regulated activity' (which covers youth work) to be subject to enhanced DBS and identity checks.*

*Registration of youth workers alongside other members of the education workforce will assist in raising their status as educators, and may provide, over time, increasingly shared support, ethical frameworks, and joint CPD opportunities.*

*Current National Occupational Standards for youth workers already establish a comprehensive framework for qualification and for the important skill set that underpin high standards of youth work delivery. However, registration with the EWC will provide additional opportunities and impetus to align youth worker NOS with those of other professionals, and for youth work NOS in turn to influence the development of those for others.*

*Traditionally youth work sits within the wider formal to non-formal education spectrum, but generally operates outside of the education provided through formal schooling. Registration with the EWC may assist the greater inclusion of youth work and youth workers in formal education settings, to the benefit of learners, through the increased recognition of youth work as an effective method of education*

## Annex

**Question 2** Do you agree that registration of the two roles (as set out in paragraph 6.2) in the first instance, will ensure the quality and professionalism of individuals employed as youth workers and protect their title and status?

Agree

**Supporting comments**

*Registration of youth workers qualified to degree level, and those qualified at youth support worker level alongside other members of the education workforce will assist in raising their status as educators. However, the use of 'youth worker' as used within the general public has over time been used very loosely to refer to anyone working with young people outside of formal settings, irrespective of whether this is in an education context or not. It may therefore prove too difficult to gain control over the title, to protect it and ensure its use is synonymous with the values the EWC will espouse for this type of professional worker. It may require a new title to be coined.*

*Current National Occupational Standards for youth workers already establish a comprehensive framework for qualification and for the important skill set that underpin high standards of youth work delivery. However, it is through registration of the professionally qualified that separation between the various levels of training, experience and skills across the current workforce will need to emerge. The profession will need to manage how this separation takes place. The guidance going forward will need to enable a context which differentiates between casual volunteer staff with rudimentary training and more highly trained and professional staff, whilst still valuing the important contribution they all make to work with young people.*

*Traditionally youth work sits within the wider formal to non-formal education spectrum, but generally operates outside of the education provided through formal schooling. Registration with the EWC may assist the greater inclusion of youth work and youth workers in formal education settings, to the benefit of learners, through the increased recognition of youth work as an effective method of education.*

*Registration will provide an additional structure where serious disciplinary matters may be heard, and evaluated, whether or not an employer's own processes result in a dismissal or warning.*

**Question 3** We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

*Nothing further to add*

## Annex

---

CR11

Name:

Organisation:

**Question 1** Do you agree that widening professional registration to include the Youth Worker sector would contribute to improving the quality of service provided to young people in Wales?

*Disagree*

**Supporting comments**

*Costly for little benefit. Given that many local authorities are moving away from having specialist youth workers in favour of more generic family intervention type roles there appears to be little value in having such a registration.*

**Question 2** Do you agree that registration of the two roles (as set out in paragraph 6.2) in the first instance, will ensure the quality and professionalism of individuals employed as youth workers and protect their title and status?

*Disagree*

**Supporting comments**

*BCBC will not have any of these roles by 31.3.17 The reason for this is that the LA has developed a whole family approach to assessment, care planning and intervention. Therefore, all staff undertake generic work relating to social care*

**Question 3** We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

---

CR12

Name: Kenneth Muir

Organisation: General Teaching Council for Scotland (GTCS)

**Question 1** Do you agree that widening professional registration to include the Youth Worker sector would contribute to improving the quality of service provided to young people in Wales?

*Agree*

## Annex

### **Supporting comments**

*Good to see Wales being far-sighted and forward looking by making this requirement for the Youth Workers sector. This is essential for promoting high quality and enhancing the value and status of youth work professionals.*

**Question 2** Do you agree that registration of the two roles (as set out in paragraph 6.2) in the first instance, will ensure the quality and professionalism of individuals employed as youth workers and protect their title and status?

*Agree*

### **Supporting comments**

**Question 3** We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

---

CR13

Name: Dominic MacAskill

Organisation: UNISON Wales

**Question 1** Do you agree that widening professional registration to include the Youth Worker sector would contribute to improving the quality of service provided to young people in Wales?

*Agree*

### **Supporting comments**

**Question 2** Do you agree that registration of the two roles (as set out in paragraph 6.2) in the first instance, will ensure the quality and professionalism of individuals employed as youth workers and protect their title and status?

*Neither agree or disagree*

### **Supporting comments**

*Registration on its own cannot “ensure the quality and professionalism of individuals employed as youth workers” (italics added), but it will contribute towards that objective. See below for full comments.*

## Annex

**Question 3** We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

---

CR14

Name: Bev Williams

Organisation: Alison House Youth & Play Project

**Question 1** Do you agree that widening professional registration to include the Youth Worker sector would contribute to improving the quality of service provided to young people in Wales?

*Agree*

**Supporting comments**

*Youth workers have specific skills which enable them to deliver non formal learning opportunities to young people; we build friendly relationships and gain reciprocal respect and trust – skills that teachers sometimes cannot achieve as banking education and their role within the classroom is more formal and less appealing to some young people.*

**Question 2** Do you agree that registration of the two roles (as set out in paragraph 6.2) in the first instance, will ensure the quality and professionalism of individuals employed as youth workers and protect their title and status?

*Agree*

**Supporting comments**

**Question 3** We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

---

CR15

Name: Gill Adams

Organisation: Carmarthenshire Youth Support Service

**Question 1** Do you agree that widening professional registration to include the Youth Worker sector would contribute to improving the quality of service provided to young people in Wales?

*Agree*

## Annex

### **Supporting comments**

*I feel that registration will help to underpin regulation; standardisation; accountability and professional identity and integrity of the profession and thus would contribute to improving the quality of service. The profession may also become more attractive to a wider group of professionals.*

**Question 2** Do you agree that registration of the two roles (as set out in paragraph 6.2) in the first instance, will ensure the quality and professionalism of individuals employed as youth workers and protect their title and status?

*Agree*

### **Supporting comments**

*Yes- I think it is very useful to have the recognised qualifications for Youth Workers and Youth Support workers laid out. It clarifies the different level of the qualification and this assists with recruitment etc.*

**Question 3** We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

*The issue of cost of registration: Additional costs related to registration incurred by staff is an issue for consideration- staff will be concerned about this. Additionally DBS registration- would this need to be applied as in the case of Care Council registration? Currently Youth Work staff are not required to re-new DBS akin Social Workers for example- again- this comes with an additional cost to staff*

---

CR16

Name: Hayden Llewellyn

Organisation: Education Workforce Council (EWC)

**Question 1** Do you agree that widening professional registration to include the Youth Worker sector would contribute to improving the quality of service provided to young people in Wales?

*Agree*

### **Supporting comments**

*The Council notes that the Welsh Government consulted in 2012 on whether registration should be extended to the youth work sector and that the majority of respondents were in favour of this proposal. The Council has also been*

## Annex

*working closely with the youth work sector in recent months and is aware that there is support for registration.*

*The Council recognises the important contribution that the youth work service provides to teaching and learning in Wales and believes that registration with a professional body will offer a number of benefits for learners, parents, guardians and the general public.*

**Question 2** Do you agree that registration of the two roles (as set out in paragraph 6.2) in the first instance, will ensure the quality and professionalism of individuals employed as youth workers and protect their title and status?

*Agree*

### **Supporting comments**

*Council officers have worked closely with Welsh Government officials to develop the proposals in paragraph 6.2. The Council is aware that some organisations / individuals consider that other persons within the voluntary youth work sector who do not fall under the definition of “professional youth worker” should also be required to register. However, the Council believes that the approach taken by the Welsh Government is proportionate and that such persons may register voluntarily, provided they meet the necessary qualification requirements.*

**Question 3** We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

*No further comments*

---

CR17

Name: Steven Gow

Organisation: Flintshire County Council

**Question 1** Do you agree that widening professional registration to include the Youth Worker sector would contribute to improving the quality of service provided to young people in Wales?

*Agree*

### **Supporting comments**

**Question 2** Do you agree that registration of the two roles (as set out in paragraph 6.2) in the first instance, will ensure the quality and professionalism of individuals employed as youth workers and protect their title and status?

*Agree*

## Annex

### ***Supporting comments***

**Question 3** We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

.

---

CR18

Name: Kirsty Gloyne

Organisation: Glyndwr University Youth & Community Student

**Question 1** Do you agree that widening professional registration to include the Youth Worker sector would contribute to improving the quality of service provided to young people in Wales?

*Agree*

### **Supporting comments**

*I feel it would help protect youth workers and our professional Identity.*

**Question 2** Do you agree that registration of the two roles (as set out in paragraph 6.2) in the first instance, will ensure the quality and professionalism of individuals employed as youth workers and protect their title and status?

*Agree*

### **Supporting comments**

**Question 3** We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

Youth worker positions are being cut and our professional Identity is misunderstood.

*I believe that being part of tis register will help reinstate our identity and will be a positive step forward for the young people of tomorrow.*

---

CR 19

Name: H T Lloyd

## Annex

Organisation: Carmarthenshire County Council – Youth Support Services

**Question 1** Do you agree that widening professional registration to include the Youth Worker sector would contribute to improving the quality of service provided to young people in Wales?

*Agree*

**Supporting comments**

*I feel that it would give better recognition for youth work, in addition to further demonstrating the value of youth work and its support for young people. It appears that youth services are being "disconnected" across Wales, what steps are Welsh Government taking to recognise these challenges.*

**Question 2** Do you agree that registration of the two roles (as set out in paragraph 6.2) in the first instance, will ensure the quality and professionalism of individuals employed as youth workers and protect their title and status?

*Agree*

**Supporting comments**

*I hope it can strengthen the quality, given that the introduction of the Social Services & Well being (Wales) Act will (I feel) increase the need for preventative services to engage with YP & families.*

**Question 3** We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

*What funding and delivery models are currently in place across Wales, what improvements can be made?*

*What is the role of the Y/work Reference Group, how can this group better communicate with youth workers on the ground?*

*What is the future shape and practice/professional identity of youth workers?*

.

---

CR20

Name: Rev Dr Philip Manghan

Organisation: Catholic Education Service

**Question 1** Do you agree that widening professional registration to include the Youth Worker sector would contribute to improving the quality of service provided to young people in Wales?

*Agree*

**Supporting comments**

## Annex

*The Catholic Education Service supports widening professional registration to include the Youth Worker sector, recognising that both volunteer and professional youth workers can play an important part in supporting young people. Ensuring that all those who work with young people, including youth workers, are registered effectively, and provided with a clear career pathway for both entrance qualification and professional development, will assist in recognising the value of youth work and the contributions that youth workers can make in the lives of young people.*

**Question 2** Do you agree that registration of the two roles (as set out in paragraph 6.2) in the first instance, will ensure the quality and professionalism of individuals employed as youth workers and protect their title and status?

*Agree*

### **Supporting comments**

*The Catholic Education Service agrees that defining the two levels of competence and status, as determined by the National Joint Council (NJC) for Local Government Services, ensures that national standards and rates of pay are applied consistently in Wales. They also provide a clear progression route for professional development..*

**Question 3** We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

---

CR21

Enw: Rebecca Williams

Sefydliad: UCAC (Undeb Cenedlaethol Athrawon Cymru)

**Cwestiwn 1** Ydych chi'n cytuno y byddai ymestyn cofrestru gweithwyr proffesiynol i gynnwys y sector Gweithwyr Ieuenctid yn helpu i wella ansawdd y gwasanaeth a roddir i bobl ifanc yng Nghymru?

*Nghytuno*

### **Sylwadau ategol**

*Nid yw UCAC yn cytuno â'r cynnig i gofrestru gweithwyr ieuenctid gyda Chyngor y Gweithlu Addysg.*

*Nid yw gweithwyr ieuenctid yn rhan o'r gweithlu addysg fel y'i deallir yn gyffredinol. Hynny yw, nid ydynt fel arfer yn gweithio mewn lleoliad/sefydliad addysg, nac yn cael eu cyflogi gan leoliad/sefydliad o'r fath, ac nid addysgu ffurfiol yw eu prif swyddogaeth.*

*Er bod gorgyffwrdd mewn manau, mae gwahaniaethau sylfaenol a phwysig yn bodoli. Ac mae gorgyffwrdd rhwng y gweithlu addysg a phroffesiynau eraill*

## Annex

*yn ogystal e.e. gofalwyr plant, ond nid yw'n fwriad – ac ni fyddai UCAC yn argymhell – eu cofrestru nhw.*

*Teimla UCAC y byddai cynnwys y grŵp hwn o weithwyr fel aelodau o Gyngor y Gweithlu Addysg yn ehangu aelodaeth y corff gam yn rhy bell, ac yn ei gwneud hi'n anoddach i gadw ffocws priodol ar flaenoriaethau'r gweithlu addysg.*

*Mi allai, felly, fod yn niweidiol i'r Cyngor ei hun, ei hygyrddedd ac 'integriti' ei weledigaeth.*

**Cwestiwn 2** - Ydych chi'n cytuno y bydd cofrestru'r ddwy swydd (fel y nodir ym mharagraff 6.2), yn y lle cyntaf, yn sicrhau ansawdd a phroffesiynoldeb unigolion sy'n cael eu cyflogi fel gweithwyr ieuencid ac yn diogelu eu teitl a'u statws?

*Nghytuno*

### **Sylwadau ategol**

*Fel uchod*

**Cwestiwn 3:** Rydym wedi gofyn cwestiynau penodol. Os oes gennych chi faterion perthnasol nad ydym wedi rhoi sylw penodol iddynt, defnyddiwch y blwch isod i roi gwybod i ni amdanynt.

---

CR22

Name: Chris Keates (Ms)

Organisation: NASUWT Cymru

**Question 1** Do you agree that widening professional registration to include the Youth Worker sector would contribute to improving the quality of service provided to young people in Wales?

*Neither agree nor disagree*

### **Supporting comments**

3. *The NASUWT questions seriously the notion that registration with the EWC will strengthen the profile of youth workers and enhance their status.*

4. *Regrettably, experience demonstrates that, for example, the former body, the General Teaching Council for Wales (GTCW), was more concerned with the generation of publicity over Professional Conduct and Professional Competence Hearings than protecting schools and the*

## Annex

*teaching profession from adverse and unnecessary publicity. This approach only served to denigrate and demoralise the teaching profession. The Union has no reason to believe that the EWC will act differently.*

- 5. Consequently, the NASUWT maintains that there is more likelihood of the status and standing of youth workers being tarnished, rather than enhanced, by the EWC.*
- 6. The NASUWT notes that under the proposals professional youth workers, who hold specific qualifications and are employed by either a local authority, school, college or the voluntary sector, will be required to register. However, it appears that youth support workers, who hold appropriate qualifications, will only be required to register if they are employed by a local authority, school or college. The Union questions the lack of explanation given for exempting youth support workers employed in the voluntary sector from registration as they will not be subject to the EWC Professional Code of Conduct and Practice (PCCP).*
- 7. In addition, the NASUWT questions why those who manage, or are otherwise in positions of scrutiny in relation to the work of registrant youth workers and youth support workers, will not have their professional and private lives policed to the same degree. The Union maintains that this has the potential to create an inequality that could allow those in positions of authority to act with impunity.*
- 8. The NASUWT has maintained consistently that all those who work in the field of education, including college principals, Estyn Inspectors, challenge advisers, line-managers and administrators, should be subject to the EWC PCCP.*

*The NASUWT has no alternative other than to remain neutral over this proposal for the reasons set out in paragraphs 3 to 8 above.*

## Annex

**Question 2** Do you agree that registration of the two roles (as set out in paragraph 6.2) in the first instance, will ensure the quality and professionalism of individuals employed as youth workers and protect their title and status?

*Neither agree nor disagree*

### **Supporting comments**

*The NASUWT has no alternative other than to remain neutral over this proposal for the reasons set out in paragraphs 3 to 5 above.*

**Question 3** We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

*The NASUWT expects due regard to be given to reducing the registration fee as the number of registrants increases. Further, the NASUWT remains of the view that as registration is a condition of employment, then the payment of the registration fee should fall on the employers not on the registrants.*

---

CR23

Name: Rev Dr Gareth Edwards

Organisation: Evangelical Movement of Wales

*We strongly oppose your plans on the grounds that the state should have no power to regulate church teaching nor for Government inspectors to police church youth work using vague and subjective terms such as "tolerance". While we would be the first to acknowledge that great care needs to be taken to ensure that extremism is closely controlled so as to ensure that British values are maintained and enhanced, in the case of Churches we see their activities as positively supporting such values as opposed to seeking to undermine them. Already our Churches, including especially our youth work activities, are subject to the various safeguarding requirements (DBS/POVA, etc) and we consider that the measures now proposed are totally unnecessary and superfluous.*

*As we understand your current proposals, they could have the following implications. For instance, if a church is running a holiday Bible Club, teaching that the Christian gospel is the only way to heaven, this could result in Inspectors determining that they hold extremist views and therefore they would be closed down. Similarly, with a Church youth group, there may be those who take the view that those attending are being indoctrinated and, as such, their views are contrary to equality laws. In reality in both instances, they are simply teaching Scripture which has been generally accepted by the majority for millennia.*

## Annex

*These proposals not only potentially affect Church organisations but also, for instance, Humanists. We could imagine a situation where a conference run by a local humanist association uses material from their “Exploring Humanism” course which states that “Religious authority has been and still is, used to justify oppression, discrimination and injustice”. Clearly this could give rise to those not subscribing to their views, complaining that the course is promoting intolerance. Equally, the proposals could impact on RAF Cadet Training where there may be a training weekend studying the bombing campaign in Syria or Iraq where complaints could be made under this proposed legislation that it is promoting hatred and violence against minority groups.*

*As you can see the proposals open a minefield of potentially unintended consequences and, as such, in our view could be avoided by either not pursuing them or ensuring that specific measures are built into any legislation so as to ensure that Christian organisations are safeguarded.*

*On your proposals for the registration of youth workers with the Education Workforce Council, these are rather vague in terms of those who might be required to register and as such we would seek specific assurances that the vast majority of Church based youth workers would remain unaffected by them.*

**Question 1** Do you agree that widening professional registration to include the Youth Worker sector would contribute to improving the quality of service provided to young people in Wales?

*Disagree*

### **Supporting comments**

**Question 2** Do you agree that registration of the two roles (as set out in paragraph 6.2) in the first instance, will ensure the quality and professionalism of individuals employed as youth workers and protect their title and status?

*Disagree*

### **Supporting comments**

**Question 3** We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

---

CR24

Name:

## Annex

Organisation:

**Question 1** Do you agree that widening professional registration to include the Youth Worker sector would contribute to improving the quality of service provided to young people in Wales?

Agree

**Supporting comments**

*I agree that we should have professional registration as it will give us more credibility and put us in line with other professions who register within their professional fields ( Social Workers/Teachers/Nurses )*

*We have to raise the status and recognition of our profession and this registration process has been discussed for so long we really need to push it forward now.*

**Question 2** Do you agree that registration of the two roles (as set out in paragraph 6.2) in the first instance, will ensure the quality and professionalism of individuals employed as youth workers and protect their title and status?

Agree

**Supporting comments**

*I agree –but have a query /comment—see below in question 3*

**Question 3** We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

*I do have one query relating to the following where it states: There are a small number of other qualifications which confer qualified youth worker status.*

- People who gained the status of qualified teacher by 31 December 1988 are recognised as qualified to hold professional youth work posts.*
- Those who gained a social science degree between 1974 and 1981 will be recognised as qualified subject to supervision and satisfactory performance in the work place for a period of one year, which has been formally signed off*
- A Diploma in Higher Education which was available prior to 2010.*

*My view is that Teaching and Youth work skills differ (granted some will overlap) as not all teaching staff / those with Diplomas in Higher Education necessarily have the same skills as Youth Workers I feel this needs to be explored more fully as our Professional Youth Work Qualifications are the bench mark for holding a Qualified Youth Work role. We have specifically studied for this role.*

---

## Annex

CR25

Enw: Catrin James

Sefydliad: Urdd

**Cwestiwn 1** – Ydych chi'n cytuno y byddai ymestyn cofrestru gweithwyr proffesiynol i gynnwys y sector Gweithwyr Ieuencid yn helpu i wella ansawdd y gwasanaeth a roddir i bobl ifanc yng Nghymru?

*Nghytuno*

### **Sylwadau ategol**

*Cytunwn ei fod yn bwysig i sicrhau bod gan y sector proffil a swyddogaeth broffesiynol a pharch at eu rôl addysgol anffurfiol a heb fod yn ffurfiol ac felly yn hapus i gefnogi hyn yn unol â'r argymhellion isod:-*

- Angen creu sefydlogrwydd o fewn y sector i greu swyddi/cyfleoedd cynaliadwy ar gyfer y sector gwirfoddol gyda dilyniant gyrfaol - nid cyfleoedd sydd yn or ddibynnol ar ffynonellau ariannol tymor byr. Mae hyn yn creu sefyllfa anodd i berson ymrwymo i ffioedd dysgu dros nifer o flynyddoedd, neu oherwydd bod ganddynt fenthyciad myfyrwyr o ganlyniad i'w gradd wreiddiol.*
- Cydnabyddiaeth bod gan y sector gwirfoddol gwaith ieuencid yng Nghymru gyfraniad at gyrhaeddiad addysgol pobl ifanc. I ddiogelu hyn mae'n angenrheidiol sicrhau fod cyrff ieuencid fel yr Urdd yn bwydo mewn i'r broses cynllunio strategol cenedlaethol a rhanbarthol ac yn rhan annatod o'r datrysiad i wireddu Cymwys am Oes: Cwricwlwm i Gymru – Cwricwlwm am oes, Hydref 2015 ar lefel rhanbarthol a lleol.*
- Bod systemau mewn lle i ddiogelu gall siaradwyr, arbenigwyr, cyfranwyr allanol ac achlysurol gyfrannu ar weithgareddau gwaith ieuencid heb orfod cofrestru gyda Chyngor y Gweithlu Addysg.*
- Rhaid cael system raddol i gofrestru sydd yn sicrhau na fydd cyrff gwaith ieuencid gwirfoddol dan anfantais.*

**Cwestiwn 2** - Ydych chi'n cytuno y bydd cofrestru'r ddwy swydd (fel y nodir ym mharagraff 6.2), yn y lle cyntaf, yn sicrhau ansawdd a phroffesiynoldeb unigolion sy'n cael eu cyflogi fel gweithwyr ieuencid ac yn diogelu eu teitl a'u statws?

*Nghytuno*

### **Sylwadau ategol**

*Rydym ond yn cefnogi 6.2 ar sail yr argymhellion canlynol:-*

## Annex

- *Bod angen ehangu a hwyluso mynediad staff cyflogedig cyfrwng Gymraeg i ddarpariaeth gymhwysu gwaith ieuenctid ôl radd a bod angen hyrwyddo hyn gan fod prinder enbyd o fewn y maes*
- *Bod yn cynnwys Gweithiwr Cymorth Ieuenctid sydd yn gweithio o fewn y sector gwirfoddol / 3ydd sector – os dylinir yr hyn sydd wedi nodi yn 6.2 yn y ddogfen ymgynghorol, gall 72.5% o ysgolion Cymru colli eu cyswllt gyda gwaith a darpariaeth ieuenctid gwirfoddol cyfrwng Gymraeg*
- *Yn unol â'r disgrifiad 'gallu' person sydd wedi cymhwyso â Thystysgrif Ymarfer Gwaith Ieuenctid L 2 a 3 sef "Lefel 2 - Paratoi i gynorthwyo gwaith ieuenctid gyda Phobl ifanc a Lefel 3 paratoi i arwain gwaith gyda phob ifanc mewn amryw sefyllfaoedd.2 ". Argymhellwn yn gryf bod y teitl y swydd yn newid i gynnwys y geiriau 'gwaith ieuenctid' (Youth Work). Byddwn yn hapus i gydweithio i lunio teitl swydd addas e.e. swyddog gwaith ieuenctid*

**Cwestiwn 3** – Rydym wedi gofyn cwestiynau penodol. Oes oes gennych chi faterion perthnasol nad ydym wedi rhoi sylw penodol iddynt, defnyddiwch y blwch isod i roi gwybod i ni amdanynt?

- *Rydym yn ddiolchgar bod ystyriaeth i wirfoddolwyr tu allan i'r gyfundrefn a'r ffioedd. Ond mae angen i ni ystyried goblygiadau hyn, mae peryg i gyfleu gwasanaeth o ansawdd is a chanfyddiad allanol isel neu wasanaeth deuol oddi wrth gyrff sydd â chanran uchel o wirfoddolwyr i gymharu â staff cyflogedig. Byddai hyn yn gam gwag i'r sector gwaith ieuenctid ar draws Cymru*
- *Hoffwn argymhell fod Llywodraeth Cymru yn ystyried sustem lle gall gyrff ieuenctid gwirfoddol cofrestru fel aelod o'r Cyngor Gweithlu Addysg, trwy arddangos prosesau sydd yn broffesiynol ac o ansawdd wrth recriwtio, anwytho, cefnogi, hyfforddi a datblygu eu gwirfoddolwyr. Byddem yn hapus iawn i drafod hyn ymhellach, gan gynnig defnyddio seiliau marciau ansawdd gwaith ieuenctid neu'r arfer da a ddatblygwyd gan CWVYS ar gyfer y marc ansawdd datblygu'r gweithlu gwaith ieuenctid gwirfoddol.*
- *Mae angen sicrhau nad yw'r system newydd yn effeithio ar bartneriaethau - ac yn eu hachosi iddynt fethu oherwydd nad oes gan y partneriaid eraill staff sydd wedi cofrestru gan Gyngor y Gweithlu Addysg. Unwaith eto, byddai'n ein cynnig uchod i weld gyrff trydydd sector yn medru cofrestru gyda Chyngor y Gweithlu Addysg yn sicrhau nad yw hynny'n digwydd.*
- *Gobeithiwn bydd y datblygiadau i gofrestru'r sector ac o ganlyniad cynnydd yn nata'r gweithlu sector arwain at adolygiad o adnoddau hyfforddi a datblygu'r sector. Gwelwn hyn yn gyfle i ddiogelu adnoddau digonol ar gyfer datblygu'r gweithlu yn enwedig gweithwyr ieuenctid cyfrwng Gymraeg/dwyieithog. O ganlyniad i effaith hanesyddol ariannu hyfforddiant gwaith ieuenctid, y Grant Hyfforddi Llywodraeth Cymru, a*

## Annex

*weinyddwyd trwy'r Awdurdodau Lleol, defnyddiwyd y cyllid i hyfforddi staff awdurdodau lleol ar gyrsiau gradd. Nid oedd yn arfer i'r arian/adnoddau yma i fod ar gael i'r sector gwirfoddol dilyn darpariaeth Addysg Uwch JNC. Mae gennym rhai enghreifftiau ble cafodd rhai unigolion y cyfle i ddilyn cwrs gradd, roedd yn eithriad ac nid oedd yn gynnig cynhwysol i'r sector.*

- *Sicrhau cydnabyddiaeth a darpariaeth hyfforddiant proffesiynol parhaus i'r holl weithlu gwaith ieuenctid - boed yn statudol neu wedi eu cyflogi o fewn y sector gwirfoddol.*

*Cydnabyddwn gall cofrestru gweithwyr ieuenctid creu cyfleoedd newydd ond mae angen diogelu rhag canlyniadau anfwriadol.*

- *Wrth ehangu ystod cofrestru'r gweithlu addysg, mae angen sicrhau nad oes canfyddiad ac ofn y bydd rheolwyr addysg ac ysgolion yn gwahardd staff mudiadau ieuenctid gwirfoddol sydd heb gofrestru rhag gweithio ar safle addysgol.*
- *Nid ydym am i ddarpariaeth gwaith ieuenctid i bobl ifanc colli'r cyfoeth o amrywiaeth sgiliau a chefnidiroedd ymhlith ei staff a gwirfoddolwyr.*
- *Gall y diffiniadau cul o gofrestru creu 'canfyddiad' ymhlith y sector o gystadleuaeth annheg ac ymdrech i ddiogelu staff awdurdodau lleol, mewn cyfnod o ansicrwydd ariannol i ddarparu gwasanaethau ieuenctid o fewn ysgol.*
- *Mae effaith gwaith ieuenctid ar bobl ifanc o ganlyniad i glytwaith o ddarpariaeth - mae pobl ifanc yn aelod o sawl mudiad ac yn derbyn gwasanaethau ar adegau gwahanol o'u bywydau, ac mae angen cydnabod hyn o fewn y cofrestru yma. A oes peryg felly, i greu gwasanaethau sydd yn rhy ffurfiol, heb amrywiaeth o brofiadau a diffyg creadigrwydd a mentergarwch.....?*

---

CR26

Name: Andy Borsden

Organisation: Wales Principal Youth Officers' Group (PYOG)

**Question 1** Do you agree that widening professional registration to include the Youth Worker sector would contribute to improving the quality of service provided to young people in Wales?

Agree

### Supporting comments

- *Whilst the core offer of personal and social education in non-formal and informal settings and via a voluntary engagement has been consistent over time, youth work continues to be responsive to the changing needs of*

## Annex

young people and has evolved to meet these needs accordingly. In more recent times, whilst the more traditional settings of youth clubs and centres are still a mainstay provision desired by a great number of young people who use the service, it has diversified to include street based, outreach and mobile work, sector specific/targeted support (e.g. Health, Schools, Social Care, Youth Justice), exchanges and residential work etc. It provides "...places and relationships within which young people can enjoy themselves, feel secure, supported and valued, learn to take greater control of their lives and recognise and resist the damaging influences which may affect them..." (Youth Work in Wales: Principles and Purposes, 2014).

- Youth work is recognised and valued as a contributor to the education of young people and the inclusion of youth workers as part of a registration body which oversees the education workforce in Wales not only recognises youth work as such but also **further supports efforts in the sector to ensure that youth workers are appropriately trained, qualified and competent** to carry out their responsibilities to and with young people they come into contact with. The WG National Youth Work Strategy (2014-18) states an intention to "...strengthen the value and status of youth work as a service and a profession" (p. 2), that "Youth work is a skilled profession and strategically we believe we must continue the drive towards an appropriately qualified youth work workforce" (p. 14) and states a "Strategic goal ... (to) Increase the proportion of professionally qualified youth workers" (p. 13). Registering youth workers also provides a further level of reassurance for users (and parents/carers) around safeguarding.
- However, the PYOG is concerned that the **current proposals do not capture all youth workers** and that those not employed by local authorities or voluntary sector organisations as a Professional Youth Worker or those employed by local authorities or voluntary sector organisations and working in settings other than schools (e.g. in Youth Offending Services, Health or Housing Settings, Fire Service etc.) will not fall under the current proposals. This has the potential to create a two-tier profession whereby only some youth workers will be required to register and others therefore will be practicing under the title 'youth worker' without the oversight of the EWC. The PYOG does however recognise the statement in 6.2, which indicates that the legislation being developed is the first step in a process; "In the first instance..." so that there is opportunity to build on this first tranche of workers who are in scope. The PYOG looks forward to engaging in these ongoing discussions to build on this.
- To date, the development of the EWC and its remit has focussed on the formal education sector and the PYOG understands the reasons for this. However, members seek assurances that **youth workers will be afforded similar opportunities and benefits offered to teachers, lecturers and work-based learning staff**. Parity of access will result in consistency of offer and status but also consistency of outcome in improving standards of safeguarding and learning. For example, the

## Annex

*rhetoric to date in relation to the New Deal for Education has been focussed solely on teachers – will the New Deal offer be widened following April 2017? The PYOG also understands that **youth workers will have access to the Professional Learning Passport**, which will be welcomed in and of itself but would wish to see this offering a platform for cross-sector learning. This is particularly relevant for youth work, which is joining the system further in the process than some other parts of the sector workforce.*

**Question 2** Do you agree that registration of the two roles (as set out in paragraph 6.2) in the first instance, will ensure the quality and professionalism of individuals employed as youth workers and protect their title and status?

Agree

### **Supporting comments**

- *The PYOG is pleased that discussions between WG, the EWC and the sector prior to the publication of the consultation has seen a change of emphasis on the first tranche of youth workers to be included. It was initially suggested that only workers who have gained recognition via a higher education establishment (at Degree level) would be required to register. The PYOG (in its response to the previous consultation Proposals for registration of the education workforce in Wales) pointed to the fact that, whilst youth work is recognised as a degree qualified profession, **there are other important competencies which are required to be a good youth worker** (particularly those of engaging positively with and gaining the trust of young people) as well as different levels of qualification affording youth support worker status. This has been reflected to a large degree in the proposal to also include Level 2 and Level 3 qualified youth support workers.*
- *However, it was also pointed out at the time that the sector has the added complexity of **a large proportion of the workforce being volunteers and part time workers**, which will require more in-depth consideration in line with the statement in 6.2 “In the first instance...”, should those not required to register under these proposals be brought into scope at a subsequent stage/s. Also, **a large proportion of the workforce deliver youth work in community settings** – the PYOG would wish to avoid a potential unintended consequence of developing a two-tier workforce in this regard, particularly as work in these settings can often be more challenging than in formal education settings, which are more structured and often within safer environments. **Community youth work in this regard often requires different/higher level of skill sets.***
- *A question posed in a previous consultation in relation to the EWC asked about the collection and interpretation of data, which will also be an important function of the EWC in relation to youth work and its overall aims to improve standards. The PYOG reiterates its request in its response to this that the EWC fully engages with the sector and the relevant section of WG in how this is carried out, in relation to the current annual collection of*

## Annex

*data from local authority Youth Services – the Youth Service Audit, which includes a section on the workforce. Further, the Data Unit has also developed a tool based on the national audit, which provides a much richer suite of information for the purpose of service improvement – this would need to be fully considered too. **The sector would wish to avoid duplication in this regard.***

- *In relation to the protection of title and status, providing the **opportunities afforded by the EWC are universally accessible** to all registrants (see comments above), the PYOG is confident that this will be a key function in this process. **The focus on and profile of the benefits of youth work have been overshadowed in recent years**, particularly in the context of school improvement services, the development of education consortia and the development of the new curriculum following the Donaldson Review. This has also been reflected within WG structures. However, the benefits of youth work are well documented; it supports learners to access formal learning opportunities, enables young people to develop a range of skills which facilitates their transition into adulthood and **is a complimentary education provision in its own right**. In this context, the PYOG welcomes the registration of youth workers with the EWC.*

**Question 3** We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

- *Assuming the registration of youth workers goes ahead from April 2017, the **current membership of the Education Workforce Council does not reflect this part of the sector**, in that it would appear that no current member represents youth work in Wales. Given that members are afforded a five year term, which is only two years in, the PYOG requests assurance that there will be sufficient representation by (or preferably before to offer opportunity for planning/preparation for youth work registration) April 2017. It is essential that there is sufficient knowledge and experience from each part of the sector when discussing such important issues related to the remit and duties of the EWC.*
- *There is no mention in this consultation of the fee which will be required for a youth worker to register with the EWC. Will this also be subject to consultation, will a separate fee structure be put in place for youth workers or will youth workers be required to pay similar fees to current registrants? The PYOG requests that any fees introduced are proportionate to the earning capabilities of the workforce.*

---

CR27

Name: Alison Mawby

Organisation: KPC Youth & Community

## Annex

**Question 1** Do you agree that widening professional registration to include the Youth Worker sector would contribute to improving the quality of service provided to young people in Wales?

*Agree in principle*

**Supporting comments**

*Agree in principle - however with reservations as below*

**Question 2** Do you agree that registration of the two roles (as set out in paragraph 6.2) in the first instance, will ensure the quality and professionalism of individuals employed as youth workers and protect their title and status?

**Supporting comments**

*This would devalue many very experienced staff who may have life experiences, a lot to bring to the role, although not be formally qualified. Within the voluntary sector we do not work to JNC (as unable to pay this rate on-going). Implications are that some organisation will be unable to gain contracts for work within the Education sector - and whilst some staff may have degree qualifications - these may not be within Youth & Community.*

*In effect it would then put much younger staff who may have the requisite qualification in a stronger position than staff with a breath of experience and knowledge - (experience for us has also shown that it is not always those who are the most highly qualified that are the best to work with young people). It would also mean that many of the "Professional Youth Workers" would be very young - and in some cases working within their own peer group. The changes give no recognition for the years of experience within role, and for those of us who don't register would make us considered of "less status".*

**Question 3** We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

---

CR28

Name: Tim Pratt

Organisation: ASCL Cymru (Association of School & College Leaders)

**Question 1** Do you agree that widening professional registration to include the Youth Worker sector would contribute to improving the quality of service provided to young people in Wales?

*Agree*

## Annex

### **Supporting comments**

*This is a logical extension of the requirements for all those who are employed within the education sector.*

**Question 2** Do you agree that registration of the two roles (as set out in paragraph 6.2) in the first instance, will ensure the quality and professionalism of individuals employed as youth workers and protect their title and status?

*Agree*

### **Supporting comments**

*An appropriate requirement to ensure all professionals are treated equitably.*

**Question 3** We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

*This is an appropriate step, however, we would not wish to see this extended to cover volunteers, who may be involved for a very small number of hours, and are not in receipt of financial remuneration. Any step in this direction could cause a significant reduction in the quantity and variety of activities on offer to young people.*

---

CR29

Name: Helen Hardwick

Organisation: The Salvation Army

**Question 1** Do you agree that widening professional registration to include the Youth Worker sector would contribute to improving the quality of service provided to young people in Wales?

*Agree*

### **Supporting comments**

**Question 2** Do you agree that registration of the two roles (as set out in paragraph 6.2) in the first instance, will ensure the quality and professionalism of individuals employed as youth workers and protect their title and status?

*Agree*

### **Supporting comments**

**Question 3** We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

## Annex

- 1. We would seek clarification as to how the proposals for registration might impact JNC youth workers employed on a **trainee/developmental** basis.*
  - 2. We welcome the proposal that the requirement for registration will not be extended to volunteer youth workers (6.4), enabling them to continue to work as youth workers on an unregistered basis.*
- 

CR30

Name: Paul Glaze

Organisation: CWVYS

**Question 1** Do you agree that widening professional registration to include the Youth Worker sector would contribute to improving the quality of service provided to young people in Wales?

*Agree*

**Supporting comments**

*Consistent with previous responses to earlier consultations in the overall process, CWVYS welcomes the move towards registration on the basis that youth work's strengths in delivering non-formal and informal education is being acknowledged, respected and given a central role in a wider educational context.*

*However, mere registration of an individual youth worker might not guarantee an improved quality of service: we would argue that this is dependent on several factors which include the quality of the youth work being delivered; the support received by the individual youth worker – including sufficient resource and managerial input; access to CPD; and clearer benefits to youth worker as a result of registration.*

**Question 2** Do you agree that registration of the two roles (as set out in paragraph 6.2) in the first instance, will ensure the quality and professionalism of individuals employed as youth workers and protect their title and status?

*Agree*

**Supporting comments**

*The 'widening' of 'professional registration' strikes CWVYS as an anomaly given that the proposal seeks to divide qualified youth workers between those with degrees and those with JNC Level 2 and JNC Level 3 qualifications. Given that (in the eyes of the sector), all such qualified personnel are qualified youth workers, the perception that quality services can only be provided by those registered is potentially a damaging one to those with Level 2 and Level 3 qualifications.*

## Annex

*Youth Workers with Level 2 and Level 3 qualifications occupy the vast majority of youth work roles in Wales (whether as paid staff or as volunteers), with a very small proportion of degree-qualified staff in post. Should the proposal as written be activated, there might be very few Youth Workers being required to register.*

*The potential for a '2-tier' system of registration might provide fertile ground for a series of unintended consequences:*

*a) the perceived devaluing of the youth work role being performed. CWVYS therefore takes issue with the proposed title of 'Youth Support Worker' for those with Level 2 and Level 3 qualifications – we would strongly suggest that the job title includes the words 'Youth Work'.*

*b) a key amendment is requested under item 6.2 (page 6) to read:  
'A JNC recognised Youth Support Worker employed to work by either a local authority, **the voluntary youth work sector**, school or college in Wales...'  
(amendment in bold)*

*c) There is clearly a perception in the voluntary sector that the proposal seeks to effectively prevent voluntary sector organisations delivering work on school premises/with schools. Given the high priority being placed on youth work in schools (as highlighted at the recent National Youth Work Conference (March 2016) and the new 'Charter for Youth Work in Wales' being based upon schools being the 'universal service for all young people in Wales', the perceived restriction of trade for the voluntary sector is a cause for real concern.*

*d) Some members have commented on how this approach amounts to a 'glass ceiling' culture: CWVYS has completed significant work to encourage paid staff and volunteers from within the voluntary youth work sector to undertake the CWVYS Induction programme at Level 2 ('A Stepping Stone to Youth Work') in preparation for individuals to embark on a learning path that includes JNC Level 2 and Level 3 qualifications which leads towards a degree. This work has also done much to encourage a positive culture of learning being fostered within voluntary youth work organisations. Without the necessary resource for learning and for CPD opportunities, we are concerned that there might be a slow-down in quality and relevance of delivery.*

**Question 3** We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

*Investment in workforce development and CPD resources is critical to the quality and relevance of youth work delivery in Wales. There is a clear opportunity to revisit the youth work training monies available to local authorities to enhance collaborative working between the voluntary and statutory sectors.*

## Annex

*The non-formal and informal approach of youth work has much to offer young people and also formal educational environments. However, the voluntary engagement nature of youth work needs to be more readily understood and its methodologies respected in its own right. Whilst we appreciate the practicalities involved in determining the make-up of the EWC, should the registration proposals be taken forward we would urge consideration of the inclusion of a youth work representative on the EWC in order to inform the ongoing debate.*

*As previously suggested (WG consultation July 2014), CWVYS would like to ask again whether it might be possible for organisations to register, as opposed to individuals within those organisations. This might apply in cases where such bodies engage significant numbers of volunteers - this could be linked to organisations' abilities to recruit, train and support volunteers that satisfy the requirements of the EWC in respect of individuals.*

*Has any consideration been given to mapping the notion of 'quality', 'improved service' against/with the expectations of the new 'Quality Mark for Youth Work in Wales' and the proposed 'National Outcomes Framework for Youth Work in Wales'?*

---

CR31

Name: Nigel Sheppard

Organisation: Merthyr Tydfil Youth Service

**Question 1** Do you agree that widening professional registration to include the Youth Worker sector would contribute to improving the quality of service provided to young people in Wales?

Agree

### **Supporting comments**

*The registration of Youth Work as a profession raises its status to a position of parity with school teachers, FE teachers and school/FE learning support workers. This therefore generates a value to the delivery of Youth Work which will affect the standard of delivery of work with young people making Youth Work professional more conscious of the need to maintain a standard to which they must attain in order to retain the registered status. Likewise this also puts the onus on employers to ensure that all staff are sufficiently qualified in order to undertake employment and to guarantee that training and appraisal records are accurate and the quality standard of delivery is maintained.*

*Youth Work is a multi-faceted and diverse profession that is not simply restricted to teaching young people and the Youth Work curriculum is more encompassing than the academic learning of young people. The social education of society at large comprehensively includes the scope of Youth Work which can be carried out either in traditional Youth Centres, Schools*

## Annex

*and colleges, outdoor centres, on the streets via Detached and outreach services, with families and societal phenomenon, in Youth Offending Services and in preventing Crime and Anti-Social Behaviour. It can be undertaken by both Voluntary and Statutory sectors. The purpose of Youth Work includes academic learning, qualification and accreditation but also includes social education, social norms, values and moral education as recognised in paragraph 4.4. Youth Work is a process which seeks to establish mutual trust, builds self-esteem and confidence which develops skills for life that are enduring and on which the beneficiaries can reflect on throughout their lives.*

*This is an incredibly complex many sided profession which is difficult to capture within the boundaries of a single qualification or registration. In order to ensure the standard of delivery is maintained and garner the respect from colleagues for the work of Youth Workers as credible legitimate and valid alongside other education professionals the level of delivery will improve and be maintained. Similarly Youth Workers will be to understand at what level they are at comparison to colleagues which consequently raises questions as to whether the draft proposals go far enough in extending the professional status to all those engaged in recognisably youth work, or if it will create a two tier profession one capturing the educational attainment of young people and the other encompassing the more social and health and well-being aspects of youth work.*

**Question 2** Do you agree that registration of the two roles (as set out in paragraph 6.2) in the first instance, will ensure the quality and professionalism of individuals employed as youth workers and protect their title and status?

Agree

### **Supporting comments**

*The registration of professionally qualified youth workers would allow us to become nationally recognised as credible members of the workforce. It is a great proposal to ensure all youth workers in Wales gain professional status in 2017.*

*Under section 6.2 of the document however; it states that in order to become professionally recognised under the new proposals youth workers need to gain a JNC recognised qualification. In the footnotes it explains that "The Joint Negotiating Committee (JNC) for youth and community workers is the body that sets the national framework used to grad and pay youth work jobs" suggesting that there is an expectation on Youth Workers being paid on JNC terms and conditions. Current restructures throughout most council departments means that youth workers are now paid on NJC so are neither on JNC terms and conditions nor pay-scales. This would put us out of the bracket for registering as the 2 requirements highlight the need for Youth Workers to be JNC; if we are not then we are not protected by the JNC framework.*

## Annex

*Where Youth Workers' are being paid on NJC but have JNC recognised qualifications requires some clarification by ETS regarding their status is needed in order to ensure that the JNC qualification is not invalidated.*

*There is a supposition that the proposal could exclude local authority Youth Workers/Support Workers should the councils decide to keep us on NJC.*

**Question 3** We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

*In order to account for the registration of Youth Workers the EWC would need to adjust to represent the Youth Work sector and to set the standard for registration. There are currently a number of organisations that could be relied on to participate in setting this standard both from within the Statutory Youth Work sector and the voluntary sector. Would both of these sectors be represented?*

*Is there any idea of what the cost would be in order for an individual to become a registered Youth Worker?*

---

CR32

Name: Rachel Burton

Organisation: WEA YMCA Community College Cymru / Glenwood Community Church

**Question 1** Do you agree that widening professional registration to include the Youth Worker sector would contribute to improving the quality of service provided to young people in Wales?

*Agree*

### **Supporting comments**

*The registration of youth workers is one important element in contributing to improving the quality of youth work. It would provide quality assurance process for youth work, in the statutory sector at first.*

*It would need to be regulated by an overarching body so that this is not tokenistic in any way and ensures that the quality of youth work provision is measured not just in the number of youth workers registered, but by the reasonable quality assurance checks and measures that support and not hinder the quality of youth work in Wales.*

*It should ensure that the essential values of youth work and its curriculum directives are recognised. Youth work engages with young people in their free/leisure time, supporting the holistic development of young people to*

## Annex

*reach their own potential. Youth work should not be measured by educational standards or health standards, but recognised for its immense contribution to these fields.*

**Question 2** Do you agree that registration of the two roles (as set out in paragraph 6.2) in the first instance, will ensure the quality and professionalism of individuals employed as youth workers and protect their title and status?

Agree

### **Supporting comments**

*It is a first step. However, the majority of youth work in Wales is carried out by the voluntary sector. I would hope to see plans in place to enable the registration of youth worker in the voluntary sector.*

*Initial training at Award and Certificate Level can highlight the need for registration. Funding support could also be given to voluntary organisations who seek to ensure that their youth workers complete training. This would benefit the worker, the employer, stake holders and **most importantly the young people.***

**Question 3** We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

*The youth workers have been engaging with and supporting the development of young people for nearly 200years. They do so because they care for and believe in young people and the potential they have to support themselves, their local community, their national community and the global community to be the best it can be. Youth work registration should reflect this. It should not just reflect a target driven agenda, but a core value base that influences the positive development of society.*

*The work of the volunteer organisations are crucial to its development and progress. Registering statutory youth workers must look to also supporting the immense contribution given by the voluntary sector to youth work. Financial support to train and register must be a definite milestone of this development.*

*Much of the work that youth workers do cannot be simply measured by educational, health or crime targets. Youth work contributes to the prevention agenda, but it is not a quick fix. I agree that we need to seek to ensure the quality of youth work by registering its work force, but this must be a supportive measure tailored to youth work and forced to fit a health, education or crime agenda. Youth work does contribute to these agendas, but it also stands alone with its own professional values and occupational standards. The registration should be an incentive and supportive regulator, and not a measuring stick. This would be deeply divisive and also hamper measure the empowering work that youth workers do, often as volunteers.*

## Annex

---

CR33

Name: Professor Sally Holland

Organisation: Children's Commissioner for Wales

**Question 1** Do you agree that widening professional registration to include the Youth Worker sector would contribute to improving the quality of service provided to young people in Wales?

Agree

### Supporting comments

*I agree. Children and young people in Wales have the right to expect that the practitioners and professionals they have regular contact with have been subject to thorough consideration on their suitability to fulfil positions of trust. I therefore welcome proposals to extend professional registration requirements to the youth work sector in Wales. Doing so would raise the profile, status and quality of youth work in Wales and ensure that appropriate safeguarding measures are in place to give greater effect to Article 19 (paragraph 1) of the UNCRC:*

*“State Parties shall take all appropriate legislative, administrative, social and educational measures to protect children from all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse, while in the care of parent(s), legal guardians(s) or any other person who has care of the child” (p.5).*

*Youth work in Wales plays a vital role in contributing to the personal, social, emotional and ethical development of children and young people. Issued under Section 123 of Learning and Skills Act 2000, Extending Entitlement: Directions and Guidance<sup>1</sup> ensures that youth work in Wales is a profession fundamentally underpinned by the obligations laid down by the UNCRC<sup>2</sup>.*

---

<sup>1</sup> Welsh Assembly Government (2002) *Extending Entitlement: Directions and Guidance* [.pdf] Available online at : <http://gov.wales/docs/dcells/publications/160108-extending-entitlement-en.pdf>  
Accessed on: 11/03/2016

<sup>2</sup> United Nations (1989) *Convention on the Rights of the Child: Adopted and opened for signature, ratification and accession by General Assembly Resolution 44/25 of 20 November 1989* [.aspx] Available online at: <http://www.ohchr.org/EN/ProfessionalInterest/Pages/CRC.aspx>  
Accessed on: 11/03/2016

## Annex

*This is further reinforced by the Principles and Purposes of Youth Work in Wales<sup>3</sup> and the National Youth Work Strategy for Wales 2014-2018<sup>4</sup>.*

*Located across an array of universal and targeted practice settings (although not an exhaustive list, these include schools, youth centres, mentoring programmes and detached provisions), youth work makes use of various practice methods to engage children and young people in a wide of range of informal and non-formal education programmes. The breadth of learning experiences offered by youth work in Wales makes the most of children's individual talents and abilities; supporting them to be the best they can be and fulfil their potential (Article 29 of the UNCRC)<sup>5</sup>.*

*With the publication of the Successful Futures<sup>6</sup> and Teaching Tomorrow's Teachers<sup>7</sup> significant pace is gathering around education reform in Wales. It is my view that youth work has a significant role to play in supporting Wales to realise its Curriculum for Life<sup>8</sup> ambitions; contributing a breadth of skills, knowledge and expertise that would be of benefit to the 4 purposes of curriculum and developing the 6 Areas of Learning and Experience. Proposals*

---

<sup>3</sup> Youth Work in Wales Review Group (2013) Principle and Purposes of Youth Work in Wales [.pdf] Available online at: <http://www.wlga.gov.uk/download.php?id=5830&l=1> Accessed on: 11/03/2016

<sup>4</sup> Welsh Government (2014) National Youth Service Strategy for Wales 2014-18 [.pdf] Available online at: <http://dera.ioe.ac.uk/19353/1/140221-national-youth-work-strategy-en.pdf> Accessed on: 11/03/2016

<sup>5</sup> UN Committee on the Rights of the Child (2001) General Comment No. 1: Article 29 (1): The Aims of Education [.pdf] Available online at: <http://docstore.ohchr.org/SelfServices/FilesHandler.ashx?enc=6QkG1d%2fPPRiCAqhKb7yhsiQql8gX5Zxh0cQqSRzx6Ze%2f9ZHeLGwBpr0TgNk7n2KwvLTyUpYZrr02J%2f7DotFSXAJUShXkO3j7y04tA46d54m4kcgEa%2b5RtfThvOH2pDQf> Accessed on: 11/03/2016

<sup>6</sup> Donaldson, G. (2015) Successful Futures: Independent Review of Curriculum and Assessment Arrangement in Wales [.pdf] Available online at: <http://gov.wales/docs/dcells/publications/150225-successful-futures-en.pdf> Accessed on: 11/03/2016

<sup>7</sup> Furlong, J. (2015) Teaching Tomorrow's Teachers: Options for the future of initial teacher education in Wales [.pdf] Available online at: <http://gov.wales/docs/dcells/publications/150309-teaching-tomorrows-teachers-final.pdf> Accessed on: 11/03/2016

<sup>8</sup> Welsh Government (2015) Qualified for Life: A curriculum for Wales – a curriculum for life [.pdf] Available online at: <http://gov.wales/docs/dcells/publications/151021-a-curriculum-for-wales-a-curriculum-for-life-en.pdf> Accessed on: 11/03/2016

## Annex

*to extend registration requirements to the youth work sector in Wales would provide parity of professional status alongside other professionals including teachers and social workers. In addition, I welcome the fact that the proposals are seeking to safeguard the JNC Terms and Conditions for Youth and Community Workers<sup>9</sup> in Wales. Amidst an erosion for youth work across the rest of the UK, realising these proposals would safeguard against uncertainty, demonstrate fairness across the sector and solidify Wales' commitment to maintaining the high quality professional learning requirements for youth work endorsed by the Education Training Standards for Wales.*

*These proposals should, however, be extended to include annual renewal requirements for youth workers and youth support workers to demonstrate their commitment to continuous professional development (CPD) following their initial registration. This should be supported by a robust national workforce development framework and provide parity alongside the minimum CPD requirements expected of other registered professions, including teachers, nurses and social workers.*

**Question 2** Do you agree that registration of the two roles (as set out in paragraph 6.2) in the first instance, will ensure the quality and professionalism of individuals employed as youth workers and protect their title and status?

Agree

### **Supporting comments**

*I agree with the proposed registration requirements outlined in paragraph 6.2 for Professional Youth Workers. However, I do not think that the proposals to only require Youth Support Workers employed by a local authority, school or college to be registered with the Education Workforce Council (EWC) are sufficient. I would like to see these proposals extended to include requirements on Youth Support Workers in paid employment in the voluntary sector to register with the EWC. This would secure full protection of the Youth Support Worker title across Wales but would not disproportionately impact upon those who give up their time to volunteer.*

**Question 3** We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

*The proposed registration requirements provide a key mechanism for Welsh Government and the EWC to coordinate further opportunities that allow*

---

<sup>9</sup> Joint Negotiating Committee (2005) Report of the Joint Negotiating Committee for Youth and Community Workers [.pdf] Available online at: [http://www.local.gov.uk/c/document\\_library/get\\_file?uuid=ccbe2a85-3f13-4f82-ae15-a05456582a53&groupId=10180](http://www.local.gov.uk/c/document_library/get_file?uuid=ccbe2a85-3f13-4f82-ae15-a05456582a53&groupId=10180) Accessed on: 11/03/2016

## Annex

*greater workforce involvement in strategic decision-making for youth work in Wales. This would support the profession, in itself, to collectively reflect, collaborate on raising the profile of youth work and identify distributed leadership potential to secure its sustained development in Wales.*

---

CR34

Name: Rob Williams

Organisation: NAHT Cymru

**Question 1** Do you agree that widening professional registration to include the Youth Worker sector would contribute to improving the quality of service provided to young people in Wales?

*Agree*

**Supporting comments**

*The status of Youth Work should be raised and widening registration could assist in aligning with all organisations delivering education and support for young people in Wales.*

**Question 2** Do you agree that registration of the two roles (as set out in paragraph 6.2) in the first instance, will ensure the quality and professionalism of individuals employed as youth workers and protect their title and status?

*Agree*

**Supporting comments**

*Registration of the two roles should ensure quality and professionalism of individuals and protect their title and status, as long as relevant standards are maintained and supported through easily accessible ongoing training.*

**Question 3** We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

*Given the levels of pay for Youth Workers, it is crucial that fees are proportionate. Ideally, we would suggest that employers pick up annual fees as it is in their interests to ensure the quality and professionalism of individuals.*

---

CR35

Name: Grant Poiner

Organisation: Boys' and Girls' Clubs of Wales

## Annex

**Question 1** Do you agree that widening professional registration to include the Youth Worker sector would contribute to improving the quality of service provided to young people in Wales?

*Agree*

### **Supporting comments**

*As an Organisation we agree that registering Youth Workers would improve the status of youth work amongst the wider education workforce sector. Hopefully there will be other benefits to registration that could also benefit Youth Workers and assist developing further quality within the sector, however, we are unsure on how this will look e.g. Will there be opportunities for further training? workforce development etc.*

**Question 2** Do you agree that registration of the two roles (as set out in paragraph 6.2) in the first instance, will ensure the quality and professionalism of individuals employed as youth workers and protect their title and status?

*Agree*

### **Supporting comments**

*We are supportive of the registration of Youth Workers who meet the specified qualifications. Within the consultation it doesn't specify that Youth Support Workers employed by the voluntary sector are required to register. Clarification on this would be beneficial.*

*We would also encourage volunteers to 'voluntarily' register though we understand that many may not wish to do this due to the extra expense.*

**Question 3** We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

*We see the positives in this proposal and are glad that workers within the voluntary youth work sector are recognised within these proposals. We are also happy that volunteers are exempt from registration as we could see there being an impact on volunteer numbers if they were made to register. We will however promote registration to these volunteers and anticipate that some will voluntarily register.*

---

CR36

Name: David Greatorex

Organisation: The Christian Institute

## Annex

### **Christian youth work in Wales**

*We are surprised that the consultation does not mention the work of churches, or faith groups more generally, in promoting activities with young people in Wales. Christians make a significant contribution to the fabric of Welsh society. Churches and Christian organisations obviously rely on volunteers to lead their work with children, but many also employ dedicated youth workers. Christians give sacrificially to fund such posts.*

*In response to the demand from churches and Christian groups for well-qualified youth workers, a number of higher education institutions in the UK offer, or have offered, degrees tailored to the distinctive character of Christian youth work. For example:*

- *University Of Chester BA (Hons) in Christian Youth Work*
- *Moorlands College BA (Hons) in Applied Theology (Youth and Community Work)*
- *International Christian College, Glasgow, BA Youth Work with Applied Theology*
- *Nazarene Theological College BA (Hons) in Theology, Youth Work and Ministry*
- *Oasis College of Higher Education BA (Hons) in Youth Work and Ministry*
- *Newman University BA (Hons) Youth and Community Work with a Christian pathway*
- *Institute for Children Youth & Mission MA in Youth and Community Work*
- *Institute for Children Youth & Mission BA (Hons) Youth and Community Work and Practical Theology*

*Of course, there are also secular youth work qualifications which will be held by youth workers in the faith sector in Wales. It is our understanding that by requiring all qualified youth workers employed in the voluntary sector to register with the Education Workforce Council (EWC), professionally qualified youth workers employed by churches and faith groups will be included in the scheme.<sup>1</sup> All the courses listed above are Joint Negotiating Committee Professional Qualifying Courses.<sup>2</sup>*

### **Secular power over church teaching**

*Youth workers in the faith sector contribute to the teaching ministry of churches and to leading religious worship. For example, they may conduct small group Bible studies, lead prayers or provide teaching during summer*

---

<sup>1</sup> *Proposed registration of youth workers: Proposal for the registration of youth workers with the Education Workforce Council, Welsh Government, 8 January 2016, paras 5.4 and 6.2*

<sup>2</sup> *Historical list of all schemes, courses and programmes, National Youth Agency, see <http://www.nya.org.uk/wp-content/uploads/2016/03/MASTER-validation-Historical-Database-Mar-2016.pdf> as at 30 March 2016; Qualifications recognised by the Joint Negotiating Committee (JNC) as conferring professionally qualified status, National Youth Agency, see <http://www.nya.org.uk/wp-content/uploads/2016/03/MASTER-validation-Database-Mar-2016.pdf> as at 30 March 2016*

## Annex

*camps. The character of their work is shaped at its core by Christian theology and practice, as can be clearly seen in the course titles listed above. But these proposals would require the Welsh Government to apply secular principles in the regulation of church youth work by:*

- *Setting out regulations for how churches must appraise the performance of their youth workers;<sup>3</sup>*
- *Specifying a code of professional conduct to which church youth workers would have to adhere;<sup>4</sup>*
- *Restricting churches' right to employ professional youth workers to those who are registered.<sup>5</sup>*

*The EWC would have investigatory powers over the actions of youth workers in the faith sector and could suspend a youth worker's registration or issue a prohibition order, preventing a church from continuing to employ them.<sup>6</sup>*

*It is not for Welsh Ministers or the EWC to set the standards by which churches appraise their youth workers. Whilst sharing public concern for the safety of young people, faith groups have distinctive beliefs about the best interests of children, which will be different from the secular beliefs likely to underpin government standards. Churches must be free to determine for themselves the standards by which their youth workers are appraised. Similarly, it is not for the state to set a code of professional conduct which governs the work of a church. Whilst there will be significant overlap between the conduct expected by a church and by secular organisations, the expectations will also be significantly different, shaped by different beliefs about human nature and personal fulfilment. Imposing a secular standard would require church youth workers to pursue secular aims, inevitably interfering with their delivery of religious teaching.*

*For example, the Youth Work National Occupational Standards referenced in the consultation document could be cited by someone seeking to prevent youth workers from teaching traditional Christian beliefs about marriage.<sup>7</sup> This is just one simple and obvious example. There are fundamental differences of belief between a secular and a Christian approach to youth work, which subtly but significantly impact upon all aspects of the work.*

### **Breaching human rights**

*The principle that the state should not interfere in church teaching is enshrined in legislation going back to Magna Carta. It is also clearly recognised in more recent legislation, such as Section 50 of the Education Act*

---

<sup>3</sup> Education (Wales) Act 2014, Section 23

<sup>4</sup> Education (Wales) Act 2014, Section 24

<sup>5</sup> *Proposed registration of youth workers: Proposal for the registration of youth workers with the Education Workforce Council*, Welsh Government, 8 January 2016, page 2; Education (Wales) Act 2014, Schedule 2 (2)

<sup>6</sup> Education (Wales) Act 2014, Sections 26, 30 and 31

<sup>7</sup> *Youth Work National Occupational Standards*, National Youth Agency, 2012, pages 5-6

## Annex

2005 which provides that schools with a religious character appoint a denominational inspector of their RE and collective worship, rather than being inspected by Estyn.<sup>8</sup>

Indeed, so fundamental is this principle that these proposals are likely to contravene Articles 9, 10 and 11 of the European Convention on Human Rights (ECHR), exposing the Welsh Government to potential legal action. The ECHR explicitly guarantees the autonomy of religious bodies, free from state interference. Article 9 relates to freedom of thought, conscience and religion, including the freedom to manifest a religion in worship, teaching, practice and observance, including “in community with others”.<sup>9</sup> Article 11 relates to freedom of assembly and association and closely relates to Article 9. For this reason, the Strasbourg court interprets Article 9 in the light of Article 11, thus safeguarding freedom of association for churches against any unjustified interference by the state.<sup>10</sup>

It is in respect of the autonomy of religious communities that the Strasbourg court has had cause to exercise its jurisdiction in relation to freedom of religion. This has essentially been in relation to countries which have not historically enjoyed the same democratic freedoms as Wales. The Court has said: “the autonomous existence of religious communities is indispensable for pluralism in a democratic society and is thus an issue **at the very heart** of the protection which Article 9 affords” [emphasis added].<sup>11</sup>

One of the most recent cases from the Strasbourg court makes clear that it is not for the state to oversee the beliefs and teachings of religious bodies:

“The Court reiterates that, but for very exceptional cases, the right to freedom of religion as guaranteed under the Convention **excludes any discretion on the part of the State** to determine whether religious beliefs or the means used to express such beliefs are legitimate. Indeed, the State’s duty of neutrality and impartiality, as defined in the Court’s case-law, is incompatible with any power on the State’s part to assess the legitimacy of religious beliefs” [emphasis added].<sup>12</sup>

Employing youth workers is a means by which churches put their beliefs into action. This includes teaching what they believe is best for the welfare of young people. The manner in which such youth workers carry out their work is determined by religious beliefs and facilitates young Christians in the exercise of their right to freedom of assembly. Youth workers engage in religious

---

<sup>8</sup> Education Act 2005, Section 50 (2)

<sup>9</sup> European Convention on Human Rights, Article 9

<sup>10</sup> *Metropolitan Church of Bessarabia and others v Moldova*, [2002] 35 EHRR 13, para. 118

<sup>11</sup> *Ibid*

<sup>12</sup> *Magyar Keresztény Mennonita Egyház and others v Hungary*, [2014] Application nos. 70945/11, 23611/12, 26998/12, 41150/12, 41155/12, 41463/12, 41553/12, 54977/12 and 56581/12, para. 76

## Annex

*worship, teaching, practice and observance in community with Christian young people and others within the church as part of their professional duties.*

### **Adequate existing regulation**

*Churches and other faith groups are already regulated by the Charity Commission, which requires them to have a safeguarding policy in place for their children's work and to carry out criminal records checks on those involved. Churches are very happy to abide by these strict safeguarding requirements.*

### **Inhibiting professionalism in the faith sector**

*These proposals could have the opposite effect to that intended. There would be an incentive for churches and other faith groups to employ youth workers **without** a professional qualification in order to avoid government regulation. This is evidently contrary to the Welsh Government's intention for the new policy and would surely disadvantage young people and prospective youth workers.*

### **Conclusion**

*It is for other branches of youth work to decide whether they wish to be regulated by the state in the way proposed. On behalf of Christians and churches in Wales we suggest three possible solutions:*

- 1. The proposals are dropped; or*
- 2. All youth workers in the voluntary and charitable sector are excluded; or*
- 3. All youth workers in churches or any charity with a religious charitable object are excluded from the need to register and be regulated by the EWC.*

**Question 1** Do you agree that widening professional registration to include the Youth Worker sector would contribute to improving the quality of service provided to young people in Wales?

*Disagree*

### **Supporting comments**

**Question 2** Do you agree that registration of the two roles (as set out in paragraph 6.2) in the first instance, will ensure the quality and professionalism of individuals employed as youth workers and protect their title and status?

*Disagree*

### **Supporting comments**

## Annex

**Question 3** We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

---

CR37

Name: Mary van den Heuvel

Organisation: ATL Cymru

### **Our Response**

*ATL Cymru welcomes the opportunity to respond to this consultation. We are supportive of measures which will ensure greater safeguarding for children and young people as well those involved in the wider education profession.*

*However, whilst we appreciate the need for a consistency of approach in registration of the wider education workforce, we would note in general the following concerns about the proposals:*

- *Concerns about Education Workforce Council*
- *Safeguarding and dual registration*
- *Consistency of approach*
- *Fees*

*Our concerns are set out below.*

### **Concerns about the Education Workforce Council (EWC)**

*ATL Cymru remains concerned about the suitability of the EWC to fulfil the proposed role set out in this consultation. EWC replaced the General Teaching Council (Wales) which was elected by the workforce and therefore more accurately reflected those working within the sector in Wales.*

*We remain concerned that the current Ministerial appointments process does not reflect the wider profession now registered with the EWC and therefore would be seriously concerned about future widening of the EWC's remit without the EWC truly reflecting those who are registered with the Council.*

### **Safeguarding and dual registration**

*We would seek reassurance that those registered as youth workers with the EWC would not be expected to also register with Social Care Wales under the Regulation and Inspection of Social Care (Wales) Act 2015. Those expected to register under that Act will be set out within a Code of practice. We believe if this measure is about safeguarding then there must be no room for confusion about where individuals should be registered.*

*The consultation sets out that those working in youth work in a voluntary capacity may choose to register voluntarily but will not be required to do so. In the social care sector voluntary registration did not work, so has been*

## Annex

*withdrawn in the latest law<sup>13</sup>. We would therefore question the introduction of voluntary registration with the EWC. This could potentially confuse the public and cause unnecessary risk.*

### **Consistency of approach**

*We are concerned that there are different expectations on different registrants with EWC. While FE lecturers are registered based on whether they have a contract, teachers and it would seem youth workers will be expected to have specific qualifications. It is difficult to achieve parity for all registrants without expecting qualifications, for example, of support workers. We would not expect all registrants to pay for new qualifications for a role they have held for many years.*

### **Fees**

*We have made very clear that those registering with the EWC should not have to pay fees. We would remind the WG that those who are employed within other professions often have their fees paid by the employer. For example, lawyers or occupational therapists working for a local authority have their fees paid. We believe that the same right should be extended to education professionals.*

**Question 1** Do you agree that widening professional registration to include the Youth Worker sector would contribute to improving the quality of service provided to young people in Wales?

*Neither agree nor disagree*

### **Supporting comments**

Please see our comments above relating to concerns about safeguarding and the EWC.

**Question 2** Do you agree that registration of the two roles (as set out in paragraph 6.2) in the first instance, will ensure the quality and professionalism of individuals employed as youth workers and protect their title and status?

*Neither agree nor disagree*

### **Supporting comments**

Please see our comments above relating to a consistency of approach.

**Question 3** We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

*Please see our comments above.*

---

<sup>13</sup> <http://www.assembly.wales/Research%20Documents/15-014%20Social%20Care%20Bill/15-014.pdf>

## Annex

---

CR38

Name: Helen Kneale

Organisation: Glyndwr University/ Wrexham Youth Service

**Question 1** Do you agree that widening professional registration to include the Youth Worker sector would contribute to improving the quality of service provided to young people in Wales?

*Agree*

**Supporting comments**

*I think professional registration will probably improve recognition of youth work methods, values and principles which in turn may improve the quality of service to young people. However, it is important that those methods, values and principles are not eroded as part of the registration process. Youth work is essentially informal education that starts from where young people are, without pre-judgement or agenda and these core principles should remain unchanged.*

**Question 2** Do you agree that registration of the two roles (as set out in paragraph 6.2) in the first instance, will ensure the quality and professionalism of individuals employed as youth workers and protect their title and status?

*Agree*

**Supporting comments**

*Yes. But I do not think that there should be a requirement for that youth worker to be **employed to work by either a local authority, school, college or the voluntary sector**. I think registration should be offered to all professional youth workers and qualified youth support workers, regardless of their employment status. For example, many youth workers are currently engaged in social enterprise activities, or, given the current climate, are in between posts or working ad hoc for various agencies. My own position is that I teach on the BA and PG Dip Youth and Community Work programmes – according to the current criteria I would be unable to register (although I also part time employed as a youth support work for a LA – does this mean I would have to register as a youth support worker despite my professional qualification?*

*If a youth worker holds the qualification, and can demonstrate ongoing relevant CPD then they should be allowed to register (indeed it may become a criteria on person specifications etc in the future).*

**Question 3** We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

## Annex

- *Paying a fee for registration is fine, however the fee structure will need to be appropriate*
  - *Registration is a welcome acknowledgement of the value of youth work*
  - *Vital that core principles etc are not eroded as part of this process*
  - *Will there be a CPD requirement and what might this look like*
  - *How will the professional qualification be protected in the current climate when JNC terms and conditions are being rejected by employers – separation of qualification from terms and conditions is needed.*
  - *Will registration be compulsory or optional – how will this be implemented and managed?*
  - *Although this move has been prompted by a need for educators in school settings to be registered, it is important that this is seen as a profession-wide strategy and not just for those working in schools. We are already seeing a divide (at least in recognition by funders etc) towards a separation between school based and community based youth work, with community based youth work, largely, being undervalued and, in the worst cases, removed due to funding cuts – this should not be in any way upheld/supported by the registration process.*
  - *Registration should be overseen by youth work professionals – i.e. who will make decisions about removal from the register etc – youth work practitioners should be involved in any such panel.*
- 

CR39

Name: Jess Achilleos

Organisation: Wrexham Glyndwr University

**Question 1** Do you agree that widening professional registration to include the Youth Worker sector would contribute to improving the quality of service provided to young people in Wales?

*Agree*

### **Supporting comments**

*I believe that registration of professional youth workers would raise the profile of quality youth work undertaken across Wales amongst the wider professional field of education. Informal education with young people aids a holistic approach to education and achievement, professional registration of youth workers would encourage and support this approach.*

**Question 2** Do you agree that registration of the two roles (as set out in paragraph 6.2) in the first instance, will ensure the quality and professionalism of individuals employed as youth workers and protect their title and status?

*Agree*

## Annex

### **Supporting comments**

*I think that it would help to ensure the quality and professionalism of existing work and also encourage and promote youth work practice as a professional field amongst within the wider professional field.*

**Question 3** We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

*I think that it is important to acknowledge that a great deal of quality youth work already exists but that it is poorly recognised for its educational value and overall wellbeing of young people. I believe that professional registration would help ensure that this field of work is valued and encouraged amongst the wider field of practitioners working to support young people.*

---

CR40

Name: Gareth Newton (Chair)

Organisation: Education and Training Standards (ETS) Wales

**Question 1** Do you agree that widening professional registration to include the Youth Worker sector would contribute to improving the quality of service provided to young people in Wales?

*Agree*

### **Supporting comments**

*There is a well – understood causal relationship between the acquisition of professional qualifications and the consequent ability to demonstrate competence in carrying out employment-related role(s) associated with such qualifications. This is the case for teachers, and it is no less the case for youth workers, who are important educators in their own right.*

*The quality of service provided by a registrant is largely a matter of the individual worker's competence (by which we mean the ability to translate skills, knowledge and experience into effective practice), how well s/he is supported and developed by her / his employer, and whether the resources available are adequate for the role. Registration, it seems to us, is more about protecting quality of service through the Education and Workforce Council's judicious use of Fitness to Practise criteria.*

*There is no extant protection of title for the term "youth worker". Without such protection the youth work profession will rely upon the registration of JNC recognised youth workers / youth support workers with the Education Workforce Council as one means of demonstrating the relationship between qualification gained, the ability of the registrant and the quality of service provided to young people. Under these circumstances, the Education and*

## Annex

*Training Standards Committee (ETS) is confident that registration is a positive move in securing the quality of service to young people in Wales.*

**Question 2** Do you agree that registration of the two roles (as set out in paragraph 6.2) in the first instance, will ensure the quality and professionalism of individuals employed as youth workers and protect their title and status?

Agree

### **Supporting comments**

*ETS agrees there is a relationship between registration and quality of work, and between registration and demonstrating professionalism. Nevertheless, whilst this is presented as one question, we consider there are a number of quite separate and distinct matters here which we will address individually.*

*First: the matter of the relationship between registration and quality. Our response to question 1 demonstrates that we believe there is a link between registration and quality. Of equal importance, however, (in our view, at least) is the link between guaranteed access for the individual registrant to continuing professional development (CPD) and the capacity to continue delivering relevant, engaging and effective learning opportunities for young people. We believe that registration is but the first step in the process of securing the link between registration and quality, and that access to appropriate, timely, and targeted CPD will be vitally important for every registrant and, by extension, for the young people with whom s/he works.*

*Second, and in regard to the matter of demonstrating professionalism, registration will provide youth workers with access to the EWC's "Code of Professional Conduct and Practice" which sets out the standards of conduct required of all registrants. Youth work in Wales is already supported by an agreed code of ethics, but this code is essentially a voluntary one and does not have the regulatory underpinnings of the EWC's Code. ETS anticipates that registered youth workers and youth support workers will behave in a way consistent with the highest standards of ethical practice, but the requirement on all registrants to comply with the EWC's Code may well serve to strengthen public confidence in the youth work profession.*

*Third, ETS agrees that the two categories of youth worker / youth support worker set out in paragraph 6.2 of the Consultation Document are the appropriate categories for registration in the first instance (although see our response under Question 3 below). The ETS position is that all youth workers in Wales who hold the appropriate qualifications, and are employed to carry out youth work activity, should have access to the Register. Nevertheless, we accept that it is reasonable to carry out a phased approach to registration and we look forward to working with the EWC as additional categories of youth worker are added to the Register over time.*

*We are not confident that – on its own – registration will provide sufficiently for protection of title and status. Much will depend on robust EWC guidance to*

## Annex

*employers setting out the benefits accruing from ensuring that all applicants for youth work positions are on the EWC Register. We anticipate that the Welsh Government will also convey to employers the importance of ensuring that youth workers are appropriately registered with the EWC.*

**Question 3** We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

*We hope there is a typographical error in the second bullet point under paragraph 6.2 of the Consultation Document. We believe it should read as: “A Joint Negotiating Committee (JNC) recognised Youth Support Worker employed to work by either a local authority, school, college, or the voluntary sector in Wales . . . “. Amending the text in this way provides congruence with the first bullet point under paragraph 6.2.*

*We do not believe it is appropriate to exclude Youth Support Workers employed to work in the voluntary sector from the benefits accruing from registration – even were there to be an intention to add such workers to the EWC Register at a later stage. Such an approach risks drawing an unhelpful and invalid value-based distinction between workers employed by the voluntary sector and workers employed by local authorities, schools and colleges.*

---

CR41

Name: Dan Boucher

Organisation: Christian Action Research and Education

*CARE is concerned by the lack of any reference to Church youth work in the consultation.*

*Numerous degree courses in Christian youth work are available in addition to secular qualifications. Christian youth workers are involved in teaching Christian beliefs and the idea that every qualified youth worker should have to register to a secular body to assess their religious function is inappropriate and contrary to human rights law.*

*It is a very long established principle that the state does not interfere in Church teaching and is reflected, for example, in Section 50 of the Education Act 2005 which ensures that the religious aspects of a Church school are inspected by a denominationally approved inspector rather than by the state through Estyn.*

*Moreover, internationally the European Court of Human Rights has been clear that: “the autonomous existence of religious communities is indispensable for*

## Annex

*pluralism in a democratic society and is thus an issue at the very heart of the protection which Article 9 affords”<sup>1</sup>*

*The Court stated in crucial case of Hasan and Chaush v Bulgaria:*

*“The Court reiterates that, but for very exceptional cases, the right to freedom of religion as guaranteed under the Convention excludes any discretion on the part of the State to determine whether religious beliefs or the means used to express such beliefs are legitimate. Indeed, the State’s duty of neutrality and impartiality, as defined in the Court’s case-law, is incompatible with any power on the State’s part to assess the legitimacy of religious beliefs” .<sup>2</sup>*

*If the Welsh Government seeks to apply its proposals to qualified Christian youth workers then it is likely that this would have the unintended consequence of incentivising Church youth workers not to seek youth work qualifications in order to avoid improper state regulation.*

*Mindful of these considerations we suggest that the Welsh Government should not require qualified Christian youth workers to be subject to its proposals.*

**Question 1** Do you agree that widening professional registration to include the Youth Worker sector would contribute to improving the quality of service provided to young people in Wales?

*Disagree*

### **Supporting comments**

**Question 2** Do you agree that registration of the two roles (as set out in paragraph 6.2) in the first instance, will ensure the quality and professionalism of individuals employed as youth workers and protect their title and status?

*Disagree*

### **Supporting comments**

**Question 3** We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

---

<sup>1</sup> Overview of the Court’s case-law on freedom of religion, para 21.

[http://www.echr.coe.int/Documents/Research\\_report\\_religion\\_ENG.pdf](http://www.echr.coe.int/Documents/Research_report_religion_ENG.pdf)

<sup>2</sup> Hasan and Chaush v Bulgaria, 26 October 2000 [ECtHR]Case no 30985/96, Para 78.

## Annex

CR42

Name: Sian Davies

Organisation: Llanharan Community Development Project Ltd

**Question 1** Do you agree that widening professional registration to include the Youth Worker sector would contribute to improving the quality of service provided to young people in Wales?

*Agree*

**Supporting comments**

*Registration reflects the importance of the role of a Youth Worker and maintain professional standards of practice in line with the wellbeing of young people they work with. Therefore, I see this is a positive direction to recognise the professionalism of the role of a youth worker.*

**Question 2** Do you agree that registration of the two roles (as set out in paragraph 6.2) in the first instance, will ensure the quality and professionalism of individuals employed as youth workers and protect their title and status?

*Agree*

**Supporting comments**

In any other role in the social care sector all staff have to retain a level of qualification and as employers we have to ensure staff / volunteers hold the relevant qualification.

**Question 3** We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

---

CR43

Name: Andrew Mc kay

Organisation: DONE IT ALL

**Question 1** Do you agree that widening professional registration to include the Youth Worker sector would contribute to improving the quality of service provided to young people in Wales?

*Neither Agree or Disagree*

**Supporting comments**

## Annex

*Having worked in this sector for approx 20 years but only educated to certificate level in this field, I find that workers with higher qualifications are not as driven or aware of many of the youth work initiatives/opportunities open to young people. Quite ashamedly most students entering this sphere only see the residential s and weekends away as youth work.*

**Question 2** Do you agree that registration of the two roles (as set out in paragraph 6.2) in the first instance, will ensure the quality and professionalism of individuals employed as youth workers and protect their title and status?

*Disagree*

### **Supporting comments**

*Add to that a certificate / diploma in management.*

**Question 3** We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

*I honestly cannot see why other degrees or qualifications cannot enhance the youth work qualification. There will always be room within degree courses for the norm, however, degrees are in my opinion only the opportunity to regenerate what someone else has written, and offers the student no opportunity to express an opinion about their life experiences. There has to be some recognition of past experiences in this work with evidence, otherwise youth work in Wales will quickly loose a lot of creativity and experience . Take a leaf from funders who look at the organisation as a whole, and are the backbone of voluntary ( or 3rd sector as statutory services like to call them) funding. They will find very little evidence of funding from themselves for the sector, and even less effective partnership working, so why are we all of a sudden asked to work within their frameworks etc? Shame on the voluntary sector reps for working in tandem with governmental bodies to drive youth work and people with experience down a very narrow road of qualifications. We have always delivered more for less in the voluntary sector, because we are creative with funding, resources and our stakeholders, these very narrow learning pathways will put youth work in Wales back into the dark ages.....and remember it will be taken there by the same people who only learned from books..end of rant....RIP youthwork in Wales. I dont need a degree in youth work to get young people into work, to address a complex web of issues, to support them in their personal needs as they develop, as a matter of fact not only can I talk about these needs / issues I can provide evidence of my work. I chose several years ago NOT to complete my degree after attending an interview in Trinity college Carmarthen at the interview they wanted me to start again from the bottom, this in my mind was totally insulting to what I had academically achieved and even more so to the young people I had worked with. I run possibly one of the most successful youth organisations in Bridgend, our record is second to none, We have seen statutory youth services with workers who have degrees, masters etc and*

## Annex

*guess what they cant hold a candle to this service....so you demonstrate to me how having a ship full of workers with these potential requirements enhances services to young people. In closing can someone tell me who,s footing the bill for these educational requirements? Cynically I will suggest that in the long term it will be the young people of Wales...you work it out!!*

---

CR44

Name: Elaine Williams

Organisation: Mid and West Wales Fire and Rescue Service

**Question 1** Do you agree that widening professional registration to include the Youth Worker sector would contribute to improving the quality of service provided to young people in Wales?

*Agree*

**Supporting comments**

*Excellent idea - as an Emergency Service we have dedicated youth workers so this is a proactive way towards developing Youth Work within the Fire and Rescue Service.*

**Question 2** Do you agree that registration of the two roles (as set out in paragraph 6.2) in the first instance, will ensure the quality and professionalism of individuals employed as youth workers and protect their title and status?

*Agree*

**Supporting comments**

**Question 3** We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

---

CR45

Name: Dave Sommerville

Organisation: DofE Award, Pembrokeshire Youth Services

**Question 1** Do you agree that widening professional registration to include the Youth Worker sector would contribute to improving the quality of service provided to young people in Wales?

*Neither Agree or Disagree*

## Annex

### **Supporting comments**

*It would make no difference.*

*Also it would not include youth workers who don't hold youth work qualifications. There are many of these and they do a lot of very good work, in fields such as sport, music, DofE, arts etc. Equally there could be some that are not so good. Either way, they're not included.*

**Question 2** Do you agree that registration of the two roles (as set out in paragraph 6.2) in the first instance, will ensure the quality and professionalism of individuals employed as youth workers and protect their title and status?

*Neither Agree or Disagree*

### **Supporting comments**

*It will make no difference, they are already qualified.*

**Question 3** We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

*This sounds like it has been devised to make a job for someone. At a time of so many cuts, we can ill afford to create a new and expensive layer of bureaucracy, when there is no demand for it.*

---

CR46

Name: Alexandra Atkins

Organisation: Swansea Carer Centre

**Question 1** Do you agree that widening professional registration to include the Youth Worker sector would contribute to improving the quality of service provided to young people in Wales?

*Neither Agree or Disagree*

### **Supporting comments**

*Not enough info on the positives and negatives of being registered. Need more information to decide*

**Question 2** Do you agree that registration of the two roles (as set out in paragraph 6.2) in the first instance, will ensure the quality and professionalism of individuals employed as youth workers and protect their title and status?

## Annex

*Neither Agree or Disagree*

### **Supporting comments**

*Still not enough info explained in a simplistic way.*

**Question 3** We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

*Tell is in a young person why the possitives and negatives of this implementation*

---

CR47

Name: Alan Lansdown

Organisation: Evangelical Movement of Wales/ Hebron Hall Christian Conference Centre / Zone Trustee of the Gideons International

*I am writing to you as an individual, as a member of the Management Board of the Evangelical Movement of Wales, a Trustee of Hebron Hall Christian Conference Centre in Dinas Powys and also Zone Trustee of the Gideons International, to express my – and indeed our collective concern – over your plans to inspect/impact on church youth work as outlined in the two consultation documents that you are currently circulating, namely on Out of school education settings and also the one on the proposed registration of youth workers with the Education Workforce Council.*

*In both instances we strongly oppose your plans on the grounds that the state should have no power to regulate church teaching nor for Government inspectors to police church youth work using vague and subjective terms such as “tolerance”. While as a former Senior Civil Servant in the Welsh Government including at one time Registrar of Independent Schools in Wales, I would be the first to acknowledge that great care needs to be taken to ensure that extremism is closely controlled so as to ensure that British values are maintained and enhanced. However, as Churches we see our youth activities as positively supporting such values as opposed to seeking to undermine them. Already our Churches and our para Church organisations, including especially our youth work activities, are subject to the various safeguarding requirements (DBS/POVA, successors to CRB etc which in particular in the light of the North Wales Child Abuse Inquiry I, amongst others, took the lead in developing and implementing in Wales)) and we consider that the measures now proposed are totally unnecessary and superfluous.*

*As we understand your current proposals, they could have the following implications. For instance, if a church is running a holiday Bible Club, teaching that the Christian gospel is the only way to heaven, could result in Inspectors determining that they hold extremist views and therefore they would be closed*

## Annex

*down. Similarly, with a Church youth group, there may be those who take the view that those attending are being indoctrinated and, as such, their views are contrary to equality laws. In reality, in both instances, they are simply teaching Scripture which has been generally accepted by the majority for millennia.*

*These proposals also not only potentially affect Church organisations but also, for instance Humanists. We could imagine a situation where a conference run by a local humanist association uses material from their “Exploring Humanism” course which states that “Religious authority has been and still is, used to justify oppression, discrimination and injustice”. Clearly this could give rise to those not subscribing to their views, complaining that the course is promoting intolerance. Equally, the proposals could, for example, impact on RAF Cadet Training where there may be a training weekend studying the bombing campaign in Syria or Iraq where complaints could be made under this proposed legislation that it is promoting hatred and violence against minority groups.*

*As you can see the proposals open a minefield of potentially unintended consequences and, as such, in our view could be avoided by either not pursuing them or ensuring that specific safeguards are built into any legislation so as to ensure that Christian organisations are safeguarded.*

*On your proposals for the registration of youth workers with the Education Workforce Council, these are rather vague in terms of those who might be required to register and as such we would seek specific assurances that the vast majority of Church based youth workers would remain unaffected by them.*

*I would, therefore, ask that you note our concerns and also agree that a meeting takes place, ideally, with your senior officials and myself and my colleagues to discuss these proposals and our opposition to them but also equally to allow us to secure clarification on a range of issues and assurances in each case.*

**Question 1** Do you agree that widening professional registration to include the Youth Worker sector would contribute to improving the quality of service provided to young people in Wales?

*Disagree*

### **Supporting comments**

**Question 2** Do you agree that registration of the two roles (as set out in paragraph 6.2) in the first instance, will ensure the quality and professionalism of individuals employed as youth workers and protect their title and status?

*Disagree*

### **Supporting comments**

## Annex

**Question 3** We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

---