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Llywodraeth Cymru  
Welsh Government

Welsh Government  
Consultation – summary of responses

## Social Services and Well-being (Wales) Act 2014

Statutory guidance in relation to Part 7 of the Act –  
safeguarding children from child sexual exploitation

February 2020

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.  
This document is also available in Welsh.

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## 1. Introduction

The Social Services and Well-being (Wales) Act 2014 (“the Act”) received Royal Assent on 1 May 2014. The Act forms the basis of a new statutory framework for social care in Wales.

From the outset, the Welsh Government made a commitment to working with people to help shape the secondary legislation, support implementation and deliver the practice and culture change being driven forward through the Act.

A consultation has been undertaken on the proposals for Working Together to Safeguard People -Volume 7- safeguarding children from child sexual exploitation. That consultation ran from 15 July to 7 October 2019.

### **Volume 7: Safeguarding Children from Child Sexual Exploitation**

provides advice on understanding CSE as a form of child sexual abuse; preventing CSE; responding to children at risk of CSE through safeguarding procedures; responding to the care and support needs of children abused through CSE; disrupting and prosecuting perpetrators and supporting child victims of CSE.

The updated guidance sets out evidence and advice about the ways in which agencies and practitioners should work together to prevent CSE and to respond to children at risk of or abused through CSE in relation to safeguarding duties under the Act.

The document was developed with a multi-agency Advisory Group, chaired by Dr Sophie Hallett, Cardiff University.

The document was informed by a review of existing policy (published in 2011) and implementation across Wales, which was published in November 2017. Small-scale consultations with children and young people who have been supported because of safeguarding issues were conducted in 2018 and the findings of this work have also informed the document.

As well as being made available to the wider public via the Welsh Government internet pages, the consultation was distributed to key stakeholder groups, including:

- Safeguarding Boards in Wales
- The Children’s Commissioner for Wales
- Third Sector organisations
- Association of Directors for Social Services Cymru
- Care and Social Service Inspectorate Wales
- Children in Wales
- National Independent Safeguarding Board
- Safeguarding Education Group
- Public Health Wales/NHS Wales Safeguarding Network

## **2. Pre-consultation engagement**

### **2.1 Review of policy and practice in Wales to safeguard children from child sexual abuse**

In January 2017, Welsh Government commissioned a review of the Wales Safeguarding Children and Young People from Sexual Exploitation (CSE) Statutory guidance, embedded definition and associated SERAF (Sexual Exploitation Risk Assessment Framework) protocol. The aim of the review was to understand how statutory guidance issued in 2011 and All Wales Protocol published in 2009 by the All Wales Child Protection Procedures Group was working in practice, and to identify ways in which it could be improved to ensure that it is fit for purpose.

The review included a literature review as well as focus groups and interviews with professional stakeholders working from across the key fields of health, policing, education, the third sector and social care, including those operating at senior and frontline levels.

The overarching recommendation from the review was that the Wales guidance, embedded definition and SERAF protocol should be updated to reflect knowledge that has emerged since they were produced, along with any developments in practice and multi-agency working in order to replicate these across all areas of Wales.

<https://gov.wales/review-wales-safeguarding-children-and-young-people-sexual-exploitation-statutory-guidance-0>

### **2.2 Consultations with children and young people**

In 2018, the Welsh Government commissioned three small-scale, well-supported consultations with children and young people who had experience of the safeguarding process, some of whom were care experienced. The consultations aimed to gather the views of children and young people about their experiences and expectations of practice to safeguard them and meet their care and support needs.

The consultations were carried out by:

- the Fostering Network;
- Dynamix;
- Barnardo's Cymru and the NSPCC working together.

A clear theme in the consultation reports was that children and young people who are subject to safeguarding procedures do not feel that they are always listened to or involved in the planning of their care and support. Children and young people described some good practice by individual practitioners and services where they felt cared for, that practitioners had time for them and that their views were valued. However they also described practice where they did not feel practitioners had time for them or valued their views.

The experiences and views of the children and young people who contributed to the consultations have directly informed the development of document.

### 3. Development of document

#### 3.1 The Advisory Group

The Advisory Group met on five occasions between January and September 2018. Membership of the group was multi-agency. A number of members have changed roles since 2018 and their role at the time the group was meeting is recorded below. We are grateful to members for the time they gave to this process and for bringing their expertise to the development of the document.

- Dr Sophie Hallett, Cardiff University. (Chair)
- Jan Coles, Operational Manager, Safeguarding and Strategic Partnerships Service Manager, Cardiff Children's Social Services;
- Cecile Gwilym, Senior Policy and Public Affairs Officer, NSPCC Cymru;
- Heather Heaney, Designated Lead Officer for Safeguarding in Education Monmouthshire County Council;
- Lisa Hedley, Business Manager, Western Bay Safeguarding Board;
- Joanne Llewellyn, Team Manager, Children's Social Services, Newport;
- Rhiannon Lloyd, Manager Assessment and Support Team, Children's Social Services Conway;
- Dr Alison Mott, Designated Doctor, Cardiff and Vale University Health Board;
- Dr Richard Pates, Clinical Psychologist, Hillside Secure Children's Home;
- Laura Scale, Senior Practice Development Officer, CAF/CASS Cymru;
- Claire Short, Wales National Manager, Stop it Now! Wales;
- Eleri Thomas, Deputy Police and Crime Commissioner, Gwent;
- Maxine Thomas, Designated Senior Person Safeguarding and Well-being Pembrokeshire College;
- Mark Vaughan, Public Protection Unit, South Wales Police;
- Sharron Wareham, Children's Services Manager, Better Futures, Barnardo's Cymru;
- Cathryn Williams, North Wales Regional CSE Social Work Advisor;
- David Williams, Principle Youth Officer, Torfean;
- Christina Worley, Team Manager, Children's Social Services Conway.

## 4. Response to the Consultation Questions

The Welsh Government received 27 responses to the consultation. Some organisations have indicated that they did not submit a formal consultation response because they had been engaged in the development of the document. Some responses were narrative and did not select a clear answer to each consultation question and some respondents did not respond to all of the consultation questions. Therefore, the total numbers recorded do not add up to 27. All responses have been considered equally in terms of comments received. A list of respondents is included at Annex A.

A summary of consultation responses together with the Welsh Government's analysis is included below.

The Consultation Questionnaire did not include a question on the Introduction to the guidance. However, some respondents commented on the Introduction chapter. The title of Volume 5 of Working Together to Safeguard People will be included in full in the final version of the guidance. There have been requests for the relevant legislation listed in the introduction to be extended and we will consider this.

<b>1. Does Chapter 1 set out the ways in which CSE can be understood and identified as a form of child sexual abuse in a clear and useful way?</b>		
<b>Yes - 17</b>	<b>No - 1</b>	<b>Unsure - 3</b>
<p><b>Summary- Overall the majority of respondents were positive in their comments about Chapter 1.</b></p> <p>The North Wales Police and Crime Commissioner responded: <i>The chapter is very concise and provides a clear understanding of the ways in which CSE can be understood and identified as a form of Child Sexual Abuse. I'm glad that it has been acknowledged within the document that a third of CSE victims are male and further work is needed to encourage male victims to report CSE.</i></p> <p>And Estyn said that: <i>The chapter sets out well the key issues relating to child sexual exploitation (CSE). Its identification, the contexts in which it might take place, and the key terms, concepts and issues within CSE.</i></p> <p>There were some specific areas for change raised in some responses.</p> <p>Betsi Cadwaladr University Health Board responded: <i>How do we identify CSE? This section does not include relevant information under this heading as only discusses disclosure. It should include identification by means of screening, information sharing, recognising the signs etc.</i></p> <p>This issue was raised in some other responses and in some responses to questions on other chapters. There were also a small number of responses which referred to the need for screening tools and risk assessments. Evidence from the review of current arrangements undertaken by CASCADE and published in 2017 and evidence from the Centre for Expertise for Child Sexual Abuse suggest that the use of risk assessment tools including SERAF has led to a process driven approach with a</p>		

focus on risk management which does not assist in longer term safeguarding outcomes. We will set this out explicitly in the guidance and set out that local authorities may wish to adopt screening tools or specific risk assessments if they wish, including the SERAF – however we would expect that these are only one element of assessment and care and support planning. We will also include explicit direction on the need to understand indicators as set out in the practitioners prompt.

The Wales NHS Safeguarding Network welcomed content on ‘consent’ as particularly useful and this was echoed in other responses.

The Wales NHS Safeguarding Network and Care Inspectorate Wales suggested specific amends to the Practitioners Prompt and these will be incorporated.

Three responses related to the views of children and young people, either provided by young people or by those working with them. The Wales Principal Youth Officers’ Group (PYOG) commented on the use of the term ‘child’ instead of child or young person:

*Whilst the legal definition of a child being up to the age of 18 years is referenced, when referring to ‘young people’ in Wales, we usually mean those aged 11-25 years old.....e.g. most 16 year olds would probably feel patronised if referred to as a child but is afforded a different level of respect when called a young person, better reflecting their chronological and developmental age.*

The Advisory Group debated this issue. The decision to use the legal definition of child included in the Social Services and Well-being (Wales) Act 2014 is twofold. First, the guidance is issued under that legislation. Second it was felt on balance by members of the Advisory Group that it was important to remind duty bearers that the guidance applies to all up to the age of 18 years and that 16 and 17 year olds are due a response as children at risk. This said we will add lines to set out the basis of this decision and to remind readers that young people will not be comfortable with being directly referred to as children.

NYAS Cymru raised the fact that young people do not recognise the term Child Sexual Exploitation and ‘*do not relate their experience with this description*’. Young people from Cardiff also felt that there should be a young person friendly definition around CSE and have developed one they use themselves in information sharing sessions. The statutory guidance is aimed at statutory safeguarding partners and those who work with children, young people and families. We will however include in the final guidance a clearer narrative on the fact that children and young people may not recognise the definition or the term as used.

A consultation with children and young people undertaken in 2018 was intended to develop such information. However, the children and young people who took part said that they did not want written information or new online content on the issue. We are aware that the Young Person’s Version of consultation guidance has been utilised in New South Wales, Australia as a practice tool to support discussions with children and young people. The Welsh Government will undertake further work to consider information for children and young people that might be used to support them and practitioners in starting a conversation about CSE.

**Welsh Government response: Some specific changes will be made on the basis of respondent comments, statements to further clarify content will be made in relation to some issues. Separately some further work will be considered on information for children and young people to support child centred practice.**

**2. Does Chapter 2 set out evidence on approaches to preventing CSE in a clear and useful way?**

**Yes -12**

**No - 2**

**Unsure - 5**

**Summary- Overall responses to this question were more mixed and some respondents were less confident about the content of Chapter 2 while others were positive about content.**

There were two principal themes from respondents who were unsure or responded with 'no' about Chapter 2. First that there is too much information in the chapter which does not lend itself to providing clarity on what should be done. Second, that the inclusion of project examples is not helpful and will become outdated.

Hywel Dda University Health Board said that: *It does not clearly tell organisations or their practitioners what they need to do.*

Flintshire County Council responded that: *The guidance is very long and could be summarised to provide a useful resource for those needing information on action to take.*

These comments run across a number of responses, we will consider which information can be edited out without losing the policy intent and we will remove the project examples from the chapter. There were also some specific comments about the order of material and these will be considered in editing. In total three respondents also asked for content on Contextual Safeguarding to be strengthened. A number of responses also referenced the need for information on Return Home Interviews following a missing incident to be strengthened.

The majority of respondents did agree that the chapter sets out evidence to preventing CSE in a clear and useful way.

Ceredigion County Council responded that: *the chapter provides a good overview of a range of interventions and approaches to preventing CSE, which is useful and informative.*

The Wales Principal Youth Officers' Group (PYOG) said that: *the PYOG agrees with this section on attachment, relationships, resilience, and indeed, youth work itself, in supporting young people in their transition to adulthood works to provide young people with the 'tools' to become confident, empowered, resilient citizens via an educative approach.*

South Wales Police responded that: *The general tone of this chapter is helpful, with particular emphasis on early intervention and prevention.*



The Royal College of Psychiatrists said that: *The College agrees with the need expressed in this chapter, for therapeutic support to be provided at an early age of a problem arising or proactively in response to known needs or experiences at the child's entry into care.*

**Welsh Government response: We will edit the chapter, remove the project examples and make changes on some specific content as suggested in responses.**

**3. Does Chapter 3 set out safeguarding procedures for children at risk of CSE in a clear and useful way?**

**Yes -9**

**No - 5**

**Unsure -2**

**Summary- There was a mixed response to the question on whether Chapter 3 sets out procedures for children at risk of CSE in a clear and useful way.**

The majority of respondents who said 'no' or 'unsure' made comments related to the Wales Safeguarding Procedures, the need for links or the need to simply insert such links instead of including the information in the guidance. Some respondents said that they were unsure because they were not clear that the content was consistent with the Wales Safeguarding Procedures.

The consultation document was published before the Wales Safeguarding Procedures and the All Wales Practice Guide: safeguarding children at risk of child sexual exploitation were published as digital documents on 11 November 2019.

The review of current policy and arrangements undertaken by CASCADE, Cardiff University and published in 2017 (see 2.1) found that the All Wales Protocol on safeguarding children from sexual exploitation shared content and approach with the 2011 statutory guidance and that this was considered a considerable strength by those who contributed to review.

**Welsh Government response: We will edit Chapter 3 and include links to the Wales Safeguarding Procedures and the relevant All Wales Practice Guides. We will reduce the information contained to refer directly to the relevant links.**

**4. Does Chapter 4 set out evidence on approaches to meeting the care and support needs of children at risk of or abused through CSE in a clear and useful way?**

**Yes -15**

**No - 3**

**Unsure - 4**

**Summary- Overall responses to this question were positive with support for the approach set out in the chapter. There were two main themes in the responses from those who were unsure or responded 'no' to this question.**

Care Inspectorate Wales responded that: *“This is a valuable source of information for practitioners, we particularly liked the emphasis on care and support rather than risk reduction to effect change. Although lengthy, this chapter is helpful in demystifying how practitioners may use their existing social work skills of relationship forming etc. to help young people”*.

The Principal Youth Officers Group (PYOG) said: *“it is positive to see a reflection from the child/young person’s perspective in this section ...by obtaining a better understanding from this perspective, we can start to design services which better meet their needs, rather than designing services which adults think will meet their needs”*.

Gwent Police and the Office of the Police and Crime Commissioner responded: *“We fully support the considerations around care and support needs in the context of the Keeping Safe report throughout this chapter. There is significant evidence based outcomes regarding care and support plans within this report, and it is positive to see these outcomes have been considered within the guidance”*

Barnardo’s Cymru said that: *“this chapter sets out clearly the evidence on what works to meet the care and support needs of children at risk of or abused through CSE”*. However the suggested the need for further information on step down provision when children reach a place of more stability in their recovery and as they reach the age of 18 years. We will consider these issues and the addition of further information on them.

The Wales NHS Safeguarding Network were concerned that: *“The way in which this chapter sets out different sections for different agencies and does not promote a multi-agency approach to working in the context of CSE”* as were Hywel Dda University Health Board.

While, Ceredigion Social Services said that: *“Reference to individual agencies is useful here”* but added that information about the functions of multi-agency fora such as MACSEs would be helpful.

The Wales NHS Safeguarding Network responded that *“The detail from research could be included elsewhere perhaps as an appendix or hyperlinked, but separately... we do not need so much”*. However Hywel Dda University Health Board said that some agreed with this position but that *“ There were views from others within HDdUHB that it was appropriate to have all the research and this made it a powerful chapter that would have impact”*

Swansea Children’s Services and Dr Carlene Firmin, Contextual Safeguarding Programme, University of Bedfordshire suggested that a contextual safeguarding approach should be included in Chapter 4. We will include lines on consideration of contextual safeguarding issues. Children and young people at risk of child sexual exploitation should have their individual safeguarding and wider care and support needs considered in shaping a response, in the same way as other children. The concept of contextual safeguarding can usefully inform consideration of issues to be addressed through a care and support plan for an individual child or young person. Information to be shared at strategic forum to inform a corporate safeguarding response. We will include content on this point.

**Welsh Government response: We will edit the chapter, include clearer direction and add some more explicit content on issues raised through specific comments. We will consider further the issue of whether breaking down information into different agencies detracts from a multi-agency approach or whether this can be addressed in a different way, through strengthened guidance on local and regional multi-agency strategic forums.**

**5. Does Chapter 5 set out arrangements for disrupting and prosecuting perpetrators of CSE and for supporting child victims in a clear and useful way?**

**Yes -13**

**No -3**

**Unsure -4**

**Summary- Overall the majority of respondents were positive in their comments about Chapter 5. Some of those who responded ‘unsure’ said that this was because the chapter deals largely with non-devolved issues, which were outside their area of expertise.**

The North Wales Police and Crime Commissioner responded that: “ *Chapter 5 sets out arrangements for disrupting and prosecuting perpetrators of CSE and for supporting child victims in a clear and useful way*”

Care Inspectorate Wales said that: “*In particular, the outline of relevant sexual offences is likely to be of significant use to a range of professionals, including frontline practitioners*”.

Ceredigion Social Services said “ *the links within the chapter are useful and the importance of multi-agency collaboration is clearly represented*”

South Wales Police responded that: “*This section is particularly helpful in our opinion and contains references to useful resources, such as the child exploitation disruption toolkit. The reference to thinking about the wider picture surrounding CSE is of particular use to policing*”. While Gwent Police and Police and Crime Commissioner said that: “*offences related to CSE are explained in detail and outline the legal framework through exploitation can be identified and prosecuted*”. However, they also set out the need to more strongly set out the links between CSE and Child Criminal Exploitation. We have referred to this elsewhere but we will consider ways to include explicit reference in Chapter 5 also.

Respondents representing Health Boards and the NHS Safeguarding network asked for wording on the referral to Sexual Assault Referral Centres to be changed from ‘should be referred’ to ‘must be referred’ and we will make this amendment. There was also reference to the fact the “Achieving Best Evidence in Criminal Proceedings: guidance on interviewing victims and witnesses, and guidance on using special measures” (2011) is being reviewed, we aware of this. Until such time as updated guidance is published, existing guidance issued by the Ministry of Justice in 2011 is to be followed.

NYAS Cymru were unsure about Chapter 5 and said that “ *Further clarity required on the decriminalisation of young people who are victims themselves through CSE and alternative restorative approaches to be used throughout Wales.*” The Welsh

Government is clear that children and young people who are sexually exploited should be supported as victims of sexual abuse. We are aware that there are children and young people who are victims of child sexual exploitation themselves and who may also have harmful sexual behaviour or may involve other children and young people in exploitation. This is a complex issue, which is discussed elsewhere in the guidance. We will consider including a more explicit statement on the ways in which children and young people may be criminalised because of issues related to their abuse through exploitation.

Veezu Taxi and Private Hire Service responded to share information about the benefits of procurement and licensing and the potential for taxi firms to contribute to police intelligence. Some of these issues are covered in Chapter 2 on preventing CSE. The Welsh Government has also committed through the 'National Action Plan on preventing and responding to child sexual abuse', to develop an exemplar Corporate Safeguarding Policy in partnership with the Welsh Local Government Association. Such a policy would consider the issues raised in the Veezu Taxi and Private Hire Service response. We will make explicit reference to this work in the final guidance.

**Welsh Government response: This Chapter includes information on largely non-devolved matters and the Welsh Government engaged early with the Home Office to agree a large part of the content. A number of responses suggest some of the information in Chapter 5 could be included in Chapter 2. We will not do this but we will make a specific reference to link the chapters. There are also specific changes and additions of information suggested in responses which we will consider in making amendments.**

**6. We asked for views on the effects that the guidance would have on the Welsh language, specifically on**

- i) opportunities for people to use Welsh; and
- ii) on treating the Welsh language no less favourably than English.

**What effects do you think there would be? How positive effects could be increased, or negative effects be mitigated?**

**Summary- There were eight responses to this question, seven of whom raised the same issues about the need to include content on the Welsh language requirements and providing services in a child's language of choice.**

One respondent felt that this question should no longer be asked as public duties in relation to the Welsh Language have been in place for some time under the Welsh Language Act 1993 and the Welsh Language (Wales) Measure 2011.

The other seven respondents included Hywel Dda University Health Board, Betsi Cadwaladr University Health Board, the Wales NHS Safeguarding Network, Estyn, Barnardo's Cymru, Ceredigion Council and Care Inspectorate Wales. Their responses all called for the need to set out information on the Welsh Language Active Offer and 'More than just words' policy in the guidance.

The introduction to the consultation draft guidance directs that the guidance should be read in conjunction with *Working together to safeguard people volume 1: introduction and overview* and *Working together to safeguard people volume 5: handling individual cases to protect children at risk*. Welsh language requirements are set out in these volumes. However, on the basis of consultation responses we will include information on Welsh language requirements in the final guidance document.

Care Inspectorate Wales said that: *We did not note reference in the text to considering the young person’s language of choice when speaking to professionals. This is likely to be particularly important when speaking about traumatic and personal experiences.*

The same issue was raised by six other respondents.

**Welsh Government response: We will include information on the importance of providing services in a child’s language of choice and on the need for interpreters to be available for some children in the guidance.**

**7. We asked whether the proposals in the consultation document regarding this guidance will have an impact on groups with protected characteristics. Protected characteristics are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex, and sexual orientation. We asked whether respondents thought that the proposals in this consultation will have any positive impacts on groups with protected characteristics? If so, which and why/why not?**

**Yes – 10**

**No – 5**

**Summary- Ten respondents provided further information in relation to their response of ‘yes’ to this question. Respondents suggested that the impact of protected characteristics on vulnerability and risk has been considered throughout the guidance.**

Hywel Dda University Health Board said that: *The document will have an impact; the impact will be positive due to its inclusivity. It is clear that it applies to people of all ages and culture. As the guidance has highlighted, those with specific protected characteristics are most often vulnerable to CSE. Highlighting these vulnerable groups the guidance helps to raise awareness and focus support.*

Estyn responded that: *“The guidance should improve provision for young people with disabilities who are at more risk than their general peers, to CSE.*

Ceredigion Council said: *The document recognises that children and families of all backgrounds are affected. The guidance highlights that specific protected characteristics can indicate and increase vulnerability to CSE. Highlighting these vulnerable groups through the guidance should help to focus assessment and support.*

Barnardo’s Cymru responded that: *“The guidance references the key issues affecting groups with protected characteristics, and highlights some of the key issues for*

*practitioners in identifying and working with BAME and LGBTQ+ children and young people”.*

The four respondents who answered ‘No’ to this question did not provide any further comment. One suggested that information about transgender and non-binary children should be strengthened.

**Welsh Government response: The responses suggest that the issue has been effectively considered within the guidance. We will review references to transgender and non-binary children.**

**8. 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:**

**Summary: In total fourteen respondents provided information in response to the invitation to report related issues that had not been specifically addressed. There were common themes across ten of these responses. There were a further three responses which did not follow the consultation questions and these are also considered here.**

Four respondents used this section to welcome the guidance and set out their support for the approach taken.

The other ten responses shared some common themes and largely called for the guidance to be edited in order to reduce the length of document; for some information to be removed or annexed and for the guidance to be more clearly formatted.

Five of these respondents called for statutory duties under the guidance to be explicitly set out.

The General Medical Council did not answer the consultation questions set but provided further information about the General Medical Council child protection guidance. We will reference this in the final guidance.

The Children’s Commissioner for Wales did not answer the consultation questions but provided a response on a number of specific issues:

- That more specific information be included on the UNCRC; Children’s Rights and aligned policy;
- Welcoming the guidance’s approach to non-discrimination and equality;
- Welcoming the inclusion of quotes directly from children and young people but asking for more specific guidance for practitioners on the child centred approach;
- Raising concerns about the use of the terms ‘CSE experienced’ ;
- Raising the issue that time with a child is needed for relational practice to be developed;
- The need to explicitly set out statutory requirements resulting from the guidance;

- Reference to Children's Commissioners' annual report call for the collection of national data following the recommendation of the UN Committee as part of their concluding remarks in 2016.

An individual also provided an email response raising issues around the terminology of stating that children can be 'forced' to share images etc when they are often groomed or enticed.

**Welsh Government response: We will edit the guidance but retain references and links to evidence. We will set out explicit direction on statutory duties resulting from the guidance. We will consider the further specific issues raised by respondents. We will provide a response to the Children's Commissioner on the issue of data collection. Some of the issues raised are addressed through the National Action Plan on preventing and responding child sexual abuse and we will cross reference to this in the final guidance.**

## **6. Welsh Government Analysis**

There was overall agreement to the proposals in relation to safeguarding of children from child sexual exploitation. This reflects the extensive engagement work in 2017 and 2018, which has informed the development of the statutory guidance.

Key themes from the responses are the need to:

- Edit the guidance to reduce the length and detail of information included;
- Include explicit direction on statutory requirements resulting from the guidance;
- The need to address in more detail a range of specific issues including for example information about the decision not to include the SERAF risk assessment and issues to do with the provision of support in the language of a child or young persons' choice.

The Welsh Government accepts all of the above themes and the guidance will be amended to reflect these areas.

We have set out in the narrative on individual questions above, those issues, which we do not intend to fully accept, and the rationale for this.



## Annex A – List of Respondents

No	Confidential Y / N	Name	Organisation/On behalf of
1.	✓		
2.		✓ Chris Weaver	Betsi Cadwaladr University Health Board
3.		✓ Dr Lorna Price	Wales NHS Safeguarding Network
4.		✓ Arfon Jones	North Wales Police and Crime Commissioner
5.		✓ Mandy Nichols-Davies	Hywel Dda University Health Board
6.		✓ Denise Moultrie	Care Inspectorate Wales
7.		✓ Steve Davies	Wales Principal Youth Officers' Group (PYOG)
8.		✓ Michael Benjamin	Estyn
9.		✓ Emma Murphy	Flintshire County Council
10.		✓ Sharon Lovell	NYAS Cymru
11.	✓		
12.		✓ Childrens Commissioner for Wales	
13.		✓	Ceredigion County Council
14.		✓ Victoria Andrews	General Medical Council
15.		✓ Cari Watts	Healthcare Inspectorate Wales
16.		✓ Desmond Broster	Veezu – the largest taxi and Private Hire service in the region
17.		✓ Damian Rees	Swansea County Council
18.	✓		
19.	✓		
20.		✓ Dr Carlene Firmin	University of Bedfordshire, Contextual Safeguarding Programme
21.		✓ HHJ Mererid Edwards	Welsh Language Liaison Judge, Cardiff Civil Justice Centre
22.	✓		
23.		✓ James Dowler	South Wales Police
24.		✓ Gwent Police and Police and Crime Commissioner Joint Response	Gwent Police and Police and Crime Commissioner Joint Response
25.		✓ Menna Thomas	Barnardos Cymru
26.		✓ Royal College of Psychiatrists Wales	Royal College of Psychiatrists Wales
27.	✓		