



COVERING STATEMENT

11 September 2013

Welsh Government Consultation Document WG18789: *A Vision for a New National Youth Work Strategy for Wales 2013-18*

The Council for Wales of Voluntary Youth Services, on behalf of its member organisations and the wider voluntary youth sector, very much welcomes the opportunity to respond to the Welsh Government's consultation document on a vision for a new National Youth Work Strategy for Wales. Crucial to putting that response together has been the considerable and much-valued contribution of CWVYS member organisations and other respondents.

The voluntary youth sector involves around 250,000 young people and delivers approximately two thirds of youth work provision in Wales through the efforts of around 40,000 volunteers and 4,000 paid staff. Achieving the commitment of the sector to a shared vision and strategy for young people is therefore extremely important.

Given that the full response seeks to reflect the detailed and substantive views of the sector, this covering statement highlights the following key issues:

- The Vision concentrates largely on services as opposed to youth work, its purposes, principles and possibilities. It tends therefore to focus on targeted provision. There is danger in seeking to separate out both universal/open access provision and targeted work when both elements can and already do co-exist within existing youth work structures. There is an opportunity to build upon this foundation rather than to seek to dismantle it.
- 'Professionalism' is as much about attitude as it is about qualifications; the Vision Paper does not appear to recognise the voluntary youth work sector's contribution, professional attitudes, commitment and values.
- Concerns were raised about how the voluntary engagement principle at the heart of youth work can have the desired impact on the scale suggested by the Vision Paper in a school setting where the working relationship is necessarily a compulsory one.

- Youth work and formal education tend to have different agenda, cultures and approaches. A shared vision is required, along with an appreciation of differing methodologies. Part of the appeal of youth work provision is its lack of formality in delivery - there is a risk of formalising that provision, resulting in 'blurred lines' and potentially losing or alienating young people in the process.
- There is a need to understand how recognition of 'essential skills' can be captured. Without the support of youth workers at a crucial, early stage in a young person's development, any policy-based ambitions to engage young people in education, employment or training opportunities are less likely to be realised in practice.
- The emphasis on support for national youth work organisations is a matter of real concern for local/community-based organisations.

More positively, respondents welcomed reference to:

- The recognition of non-formal and informal learning opportunities provided by Youth Services as an essential foundation for any meaningful discussions on a future National Youth Work Strategy for Wales and the delivery of that strategy.
- The need to address the widespread lack of recognition of the value of youth work. It is heartening to see this outlined in the Vision Paper alongside the need for two-way dialogue with wider education services.
- The statements that youth work's unique character should be based on the voluntary engagement of young people and youth workers.
- The proposal that the NVYO grant scheme should present opportunities for both core funding and project-based activities from 2015-16.

As mentioned above, CWVYS was very pleased to be asked by the Welsh Government to collate a response to the Vision Paper on behalf of the voluntary youth sector. The attached document sets out that response in detail for all the proposals contained within the Vision Paper.

We would very much welcome an opportunity discuss this response on behalf of the voluntary youth work sector and to look at ways in which we can build on the enthusiasm of the sector and the huge contribution it makes to young people and the social and economic well-being of Wales.

Rob Norris
Chair, CWVYS



**WELSH GOVERNMENT CONSULTATION DOCUMENT WG18789:
A VISION FOR A NEW NATIONAL YOUTH WORK STRATEGY FOR WALES
2013-2018**

CWVYS Response

Note: Unless otherwise indicated, 'CWVYS' is used in this response as shorthand to include CWVYS member organisations, the CWVYS Executive Committee (Board of Trustees) and CWVYS staff.

1. BACKGROUND TO THIS RESPONSE

1.1 The Council for Wales of Voluntary Youth Services, its members and the wider voluntary youth sector very much welcome the opportunity to respond to the Welsh Government's consultation document (WG18789) on a vision for a new youth work strategy for Wales. This paper summarises information collected as part of the CWVYS consultation process agreed with the Welsh Government as one of the CWVYS objectives for 2013-14.

1.2 The voluntary youth work sector works with over 250,000 young people between the ages of 11–25 years and delivers approximately two thirds of youth work provision in Wales. It is estimated that 40,000 volunteers and 4,000 paid staff are engaged in delivering work with young people within the sector.

1.3 The membership of CWVYS reflects the huge diversity and richness of voluntary youth work and includes both national and local/community based organisations. This diversity and richness was evident in the four regional meetings which formed a central part of the consultation process. Attendance was not limited to CWVYS members and did include participation from the statutory sector and organisations outside but related to the sector. Provisional findings were presented to the July meeting of the CWVYS Executive Committee and at a seminar held following the CWVYS AGM on 18 July.

1.4 CWVYS staff, trustees, regional co-ordinators and member representatives also attended the consultation events delivered by the Welsh Government during July 2013 in Cardiff, Newtown and Llandudno Junction.

1.5 The Vision Paper refers to the need for the whole youth service (voluntary and statutory) to work together strategically and operationally. CWVYS supports this wholeheartedly and already works with partners from across the voluntary and statutory youth work sectors, believing that such joint working creates better results and serves the wider sector well. Two examples illustrate that approach:

- The Wales Principal Youth Officers' Group (PYOG), the Welsh Local Government Association (WLGA), the Education and Training Standards Committee (ETS) Wales and CWVYS have recently formed the Youth Work Alliance Wales, which is a national, strategically focused forum. CWVYS was a member of the two groups that preceded the Youth Work Alliance Wales: the Standing Conference for Youth Work in Wales and the Joint Strategic Group for Youth Work in Wales.
- Partnership has also lead to specific, practical outcomes such as the design, production and publication of *Youth Work in Wales: Principles and Purposes* (2013).

2. GENERAL PRINCIPLES UNDERPINNING THIS RESPONSE

2.1 CWVYS, its members and the wider voluntary youth sector subscribe to the view presented in the *Youth Work National Occupational Standards* that youth work

assists 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.

CWVYS and the voluntary youth work sector are also committed to the statement outlined in *Youth Work in Wales: Principles and Purposes*, that

Youth work in Wales is based primarily on a voluntary relationship between young people and youth workers. The Youth Service is a universal entitlement, open to all young people within the specified age range of 11-25.

2.2 The voluntary youth work sector continues to be able and willing to deliver open access (or 'universal') youth work **and** targeted youth work – either within collaborative partnership frameworks or within individual organisations, where both open access and targeted delivery exist together for the benefit of all young people. CWVYS firmly believes that there is no benefit to be gained for young people from directing local authorities to work on a targeted basis only and for the voluntary sector to deliver open access or universal provision only. This is a false and unhelpful separation, both conceptually and practically.

2.3 In relation to the response process itself, a large number of participants expressed concern that the official consultation response form summary boxes were difficult to complete because they did not facilitate the expression of agreement or otherwise with sub-headings or bullet points and could be taken to imply a simple agreement or disagreement with all sub-headings. CWVYS has therefore been asked by its members and other respondents to structure this response as a series of general commentaries on each of the main themes and proposals. The approach used here therefore seeks to capture the voluntary youth work sector's observations as fully as possible and, in doing so, to represent the hugely significant and substantial engagement of the sector in the process.

3. THE INTRODUCTION SECTION OF THE VISION PAPER

3.1 The Ministerial foreword highlights many potentially positive aspirations. CWVYS very much welcomes

- the acknowledgement that youth work offers '*a connection to young people that is educational, challenging and fun*'.

- the recognition of non-formal and informal learning opportunities provided by Youth Services as an essential foundation for any meaningful discussions on a future National Youth Work Strategy for Wales and the delivery of that strategy.
- The positively expressed statements in the consultation document that youth work's unique character should be based on the voluntary engagement of young people and youth workers.

3.2 Less positively, respondents were concerned that there is inconsistency in the language used throughout the document i.e. 'The Youth Service' is used (see Proposal 2) exclusively in relation to local authority delivery. There is also reference to a 'Youth Work Strategy' and a 'Youth Services Strategy'. At a time when the Welsh Government is quite rightly highlighting the need for a joint-sector approach, which is welcomed by CWVYS, the choice of language here has caused confusion as well as some disquiet in terms of where the voluntary youth work sector sits within Welsh Government thinking for future policy development.

3.3 It is helpful to see a brief outline of the support currently provided by the Welsh Government. However, CWVYS believes that this section would have been significantly improved and made more meaningful if:

- the section had been accompanied by a table indicating the individual amounts paid to local authorities under the Revenue Settlement Grant scheme and how much each local authority had chosen to spend on the delivery of youth services. This table is conspicuous by its absence given the availability of the Youth Service Revenue Grant matrix shown at Annex A of the 'Vision'
- the item on the Youth Work Training Grant had been introduced and referenced more thoroughly i.e. the sector took part in a Welsh Government-sponsored study for this funding scheme and a report containing several recommendations was produced (2010) but not been made available to the sector.

3.4 In addition, respondents asked whether an impact study had been completed on the recommendations within the 2010 report. As the scheme is not explicitly referenced under the 'Proposed new funding structure' (page 16), CWVYS was asked to request a statement from the Welsh Government on the future of the Youth Work Training Grant. There is confusion surrounding the availability of, and access to, the grant. CWVYS would welcome an opportunity to discuss this further with the Welsh Government on behalf of the sector.

4. THEME 1: DELIVERING EDUCATION

4.1 Proposal 1: Alignment of Youth Service delivery in support of priorities for education

4.1.1 CWVYS offers general support to the overall aims of this proposal. Indeed, several CWVYS member organisations continue to work with schools – in some instances in transitional work with primary schools but mainly in providing access to youth workers at secondary school level. However, members have been keen to point out that education is only part of the function of youth work. The five pillars of *Youth Work in Wales: Principles and Purposes* include, in addition to the educative role of youth work, expression, participation, empowerment and inclusivity.

4.1.2 The need to address the widespread lack of recognition of the value of youth work is clearly an issue which CWVYS supports. It is heartening to see this outlined in this proposal, whilst appreciating the need for two-way dialogue with wider education services. However, it is our view that 'professionalism' is as much about attitude as it is about qualifications; the Vision Paper does not appear to recognise the voluntary youth work sector's contribution, professional attitudes, commitment and values.

4.1.3 Whilst there are several examples of good youth work in a school setting, the Vision Paper seems to suggest that only young people deemed 'at risk' require access to a Youth Service. This misconception has given rise to concern by CWVYS members that there is a general lack of understanding of youth work amongst educationalists, a concern compounded by the fact that the proposals suggest that partnerships with schools should be predicated on the willingness or reluctance of head teachers to engage with youth work organisations.

4.1.4 Comments received at CWVYS consultation events suggested that young people in schools do not receive a uniform youth work offer across Wales; it is dependent upon the working relationship between individual head teachers and organisations. This seemingly ad-hoc approach results in wild variations in service provision for young people.

4.1.5 Respondents were concerned that there is a perceived emphasis in the Vision Paper on school-based youth work and that the Vision would benefit from proposals about how out-of-hours provision might be enhanced. Similarly, concerns were raised about how the voluntary engagement principle at the heart of youth work can have the desired impact on the scale suggested by the 'Vision' in a school setting where the working relationship is necessarily a compulsory one.

4.1.6 On the specific bullet points for this proposal:

- Concerns were expressed by CWVYS members about non-Welsh speaking groups/youth workers trying to engage with Welsh-medium schools. There are issues with a lack of a 'common youth work offer' being provided in both the Welsh language and the English language. It is suggested that resources are invested to ensure that an equal 'offer' is made to all young people in Wales.
- An independent evaluation of the impact of youth work in and with schools is to be welcomed. However, clarity on what will be measured, who will be carrying out the measuring and how this will be achieved would be appreciated by the sector.
- Setting targets to increase numbers of youth workers holding JNC-recognised qualifications is an understandable ambition. However, it should be recognised that the majority of voluntary sector youth work organisations do not apply JNC conditions, mainly because of the cost implications or do not use them at all if staffed entirely by volunteers. The positive side of this proposal is that it could encourage increased numbers of youth workers to achieve Level 2 and Level 3 qualifications but targeted resources would be required to achieve this aim. As an example, CWVYS members currently enjoy access to Level 2 and Level 3 qualifications via the YMCA Wales Community College and can freely access the CWVYS Induction Programme (*'A Stepping Stone to Youth Work'*) at Level 2 and the CWVYS Quality Mark.
- CWVYS acknowledges and supports the need to promote high-quality learning opportunities and to raise standards in youth work but would ask whether the Youth Work Training Grant will be used to support this drive and how it would be implemented.

- Given that youth work and formal education tend to have different agenda, cultures and approaches, work is needed to develop a shared vision and an appreciation of differing methodologies. We would argue that part of the appeal of youth work provision is its lack of formality in delivery - there is a risk of formalising that provision, resulting in 'blurred lines' and potentially losing/alienating young people in the process. YouthLink Scotland's '*Youth Work and Schools Partnership - Curriculum for Excellence Final Report: 2007-13*' provides an interesting example of how youth work can play a key role in curriculum-based delivery.

4.2 Proposal 2: Statutory Youth Services contribution to the Youth Engagement and Progression Framework

4.2.1 Some members and other respondents agreed with the concepts outlined within this proposal but were either unclear or in disagreement with the delivery model as it does not appear to include the voluntary sector. The involvement of Careers Services and work-based learning providers was seen as not always being the answer for young people, especially in the case of many of the latter agencies, which are usually profit-driven rather than employing the holistic methodologies (including continuity of engagement) of youth work organisations.

4.2.2 As highlighted in the 'Introduction' (page 4, above), there is an inconsistency in the language used to describe 'the Youth Service' – used here to mean local authority youth services when it applies equally to the voluntary youth work sector.

4.2.3 There appears to be a marked change of emphasis in Proposal 2 to that outlined in Proposal 1, which is about the need for collaborative partnership working and development of mutual respect. Whilst it is understood that this section is entitled 'Statutory Youth Services contribution...', the tone of Proposal 2 seems to undermine those positive ambitions by excluding the voluntary sector. This was a cause for concern amongst CWVYS members. It is acknowledged that a central point of contact and information could benefit young people. However, the Welsh Government is urged to consider the impact of the 'Team Around the Family' approach and, rather than 'reinvent the wheel', to ensure that the proposed practices are effective in their support for young people.

4.2.4 On the specific bullet points for this proposal:

- It was emphasised by respondents that any 'lead or link worker' would need to understand how the whole youth work sector operates and be able to direct young people accordingly. The Vision Paper suggests that local authorities will take the lead but a young person might prefer voluntary sector support, particularly if that provides continuity for a young person who is already attached to a voluntary sector organisation.
- Respondents said that current information sharing protocols present obstacles in some instances, as that information is not always made freely available to all partners. It was strongly suggested in the work leading up to summer 2014 that it would be necessary to consider which agencies were not signing up to existing information sharing protocols in the case of referrals of young people.
- Finally, instructive comments were made about how the sharing of information can sometimes lead to unwarranted judgements being made about individual young people from the outset rather than thorough subsequent direct experience of them 'on their merits'.

4.3 Proposal 3: Provision of non-formal and informal Education

4.3.1 CWVYS is pleased to support the overall tone and key concepts contained within this proposal and agrees that non-formal and informal education are integral to the development of high-quality youth work practice. We would also agree with the aim to raise standards in youth work. *'Youth Work in Wales: Principles and Purposes'* clarifies this position, stating that

Youth work provides or facilitates non-formal, informal and structured educational opportunities and experiences which challenge both the institutions and young people themselves to enhance their personal, social and political development.

We believe that the Vision Paper and subsequent Strategy should include reference to this statement.

4.3.2 There are several areas of concern about specific bullet points in Proposal 3 that CWVYS and its members would wish to be taken into account:

- There was concern about a perceived contradiction in the paper which seemingly recognises organisational autonomy but appears to be very prescriptive on accreditation. The heavy focus on accreditation also suggests the need for a significant investment in resources, so questions were raised over who might pay for that approach.
- Much is made in the preamble about the importance of 'soft' skills but little on how this vital skill set will be recognised/accredited in the future. Serious concern was expressed about the need to understand how recognition of 'essential skills' (a description preferred to 'soft skills') can be captured and in a variety of creative ways. For example, methods and contexts can include entrepreneurship, apprenticeships, vocational settings, music, arts, emotional literacy etc. In addition, essential skills such as eye contact, attendance, socialising can be enormously important for young people but cannot always be certificated and yet 'hard' evidence is usually required. Without the support of youth workers at that crucial, early stage in a young person's development, any policy-based ambitions to engage young people in education, employment or training opportunities are less likely to be realised in practice.
- A clearer vision of what is deemed to be a 'national' accreditation scheme would be helpful. Several CWVYS members deliver their own accredited systems which are recognised nationally.
- There appears to be no reference made to celebrating the achievements of young people and youth workers.
- The Vision Paper lacks any reference to promoting young people's participation, both in decisions made in relation to youth work but also in engaging young people as active citizens in communities and in democratic decision-making processes. Numerous examples of this work can be found within Youth Forums and Youth Committees across Wales. The omission of participation was a surprise to many.
- There is a need to widen the focus in terms of youth work's reach to include detached and outreach services, residential opportunities, sport, art, culture and international exchanges.

- Welsh language skills and Welsh culture are very important but there is a perception that there is a lack of resource to support this development.
- The youth work sector is well placed to deliver and support health-based programmes including sexual health, mental health and wellbeing initiatives. However, the wider health service needs to understand how youth work operates.

As with education services, there has to be an acknowledgement of complementarity of service i.e. youth work cannot (and should not be expected to) fill any gaps in provision that are the responsibility of (and currently being experienced by) education or health services.

- Youth work in Wales also contributes to a range of Welsh Government priorities beyond those of education and health. The wider contribution of youth work in terms of its influence and positive impact on highly strategic policy issues such as tackling poverty, community development and community safety issues for example, cannot be ignored and, indeed, needs to be fully recognised.
- Finally, as with Proposal 1, there is a clear need for a significant improvement in the status of youth work in order for it to be perceived as an essential player in the social, economic and political fabric of everyday life in Wales.

THEME 2: BUILDING CAPACITY DELIVERING EDUCATION

5.1 Proposal 4: Partnership working

5.1.1 CWVYS agrees that there is a need to strengthen the relationship between the voluntary and statutory youth services in order to present the best offer for young people in Wales.

5.1.2 It is important to recognise that there is a longstanding and historical commitment to joint working, as evidenced by the regular meetings between CWVYS and the PYOG plus fora such as the Standing Conference for Youth Work in Wales and the Joint Strategic Group for Youth Work in Wales.

5.1.3 CWVYS seeks to work in close co-operation with partners from across the voluntary and statutory youth work sector. Along with the Wales Principal Youth Officers' Group (PYOG), the Welsh Local Government Association (WLGA) and the Education and Training Standards (ETS) Wales, CWVYS is a founding member of Youth Work Alliance Wales (YWAW) - a strategically focused consortium which meets regularly at a national level.

5.1.4 CWVYS delivers and pays for a successful Regional Group programme, in which its members play a full and active role in networking, sharing good practice and feeding back on national policy developments, funding opportunities and partnership working (the recent CWVYS Consortium development, for example). CWVYS engages four Regional Co-ordinators to deliver this work, all of whom are drawn from the field. PYOG representatives are invited to attend all Regional Group meetings as a matter of course and that interaction between voluntary and statutory sectors is much valued by all concerned. It is also another example of joint working.

5.1.5 The governance structure of CWVYS ensures that its trustees are drawn from the field (but chaired independently of any youth work organisation). In addition, youth work practitioners are members of its Training Committee, which ensures that the voluntary youth work sector's aims of raising the standards of youth work in Wales are delivered. An example of this is the successful delivery of the CWVYS Induction Programme (*'A Stepping Stone to Youth Work'*) and the CWVYS Quality Mark for workforce development.

5.1.6 On the specific bullet points for this proposal:

- There is a good deal of confusion as to why the Welsh Government is seeking to develop 'minimum Service Level Agreements' for work between local authorities and local voluntary youth work organisations. We urge the Welsh Government to clarify its rationale for this proposal and also to outline clearly how these arrangements might be 'directed'.
- Similar concerns exist about the proposed 'annual work plan' which will seemingly be developed by local authorities. There is much left unsaid here about the participation or otherwise of the voluntary sector in developing the work plans and also how funding might be controlled for delivery purposes. CWVYS would therefore urge the Welsh Government to acknowledge that the voluntary youth work sector is strategic in outlook and also to ensure that the voluntary sector is a full partner in any necessary procurement and tendering processes.
- There is a sense of unease about the implied forcing of partnership working through the medium of funding. This does not appear to be a sound basis upon which to develop fruitful working relationships. In addition, respondents pointed out that partnerships cannot necessarily be directed. They need to be strategic, based on the needs of young people and developed through the positive commitment of the partners. Good practice might also include the views of young people on the development of the work plans.
- Support exists from the CWVYS membership for the development of improved working relationships and as an opportunity to change things for the better. Members and other respondents also expressed very strongly the view that CWVYS has a central role to play on behalf of the voluntary youth work sector in terms of engaging in a nationally-focused process which maximises opportunities for all partners.

5.2 Proposal 5: Develop a 'virtual' youth service gateway

5.2.1 CWVYS is broadly in support of this proposal. There were many favourable points made about establishing a pan-Wales facility that serves all young people. There is a clear understanding of the need to engage with young people in innovative (but meaningful) ways and that technology, applied appropriately, can play its part in supporting high-quality youth work.

5.2.2 Specific issues raised were as follows:

- Any new service must be complementary to, and not a replacement for, face-to-face youth work. Virtual services can be used as a tool to enhance engagement but needs to bring young people into the 'real world' in order to assist effective communication in society.

- Such a new service has to include young people in its design and in its monitoring of performance and relevance. There are too many examples of high-tech innovations being imposed on a less-than-impressed population of young people (not necessarily in Wales). This is a real chance for Wales to prove itself as leading the way and to recognise that initiatives produced by young people are at least several months' ahead of any older-adult designed initiatives.
- It is important to realise that young people cannot always afford to purchase the latest technology. There is an irony that those less likely to be able to afford smart and/or web-based devices are already excluded from certain activities because of their socio-economic position in society. We suggest that this needs to be addressed.
- If this is a chance to build upon the current infrastructure as developed within the voluntary sector by CLICOnline and MEIC, then support exists for such a concept. With CLICOnline now achieving its aim of working from within all 22 local authority areas, it would seem appropriate to use that as a sound basis for the future, as opposed to setting up brand new structures.
- Respondents also raised the important point that in order for this proposal to succeed, there is a need to ensure that youth centres are adequately resourced in terms of IT equipment. There is no doubt that attendance at youth centres is enhanced by the availability of high quality IT, which then presents additional opportunities for young people to engage in and to develop positive working relationships with youth workers and communities.
- There is a need to consider full digital inclusion for Wales which includes free-to-access, stable and strong wi-fi so that any such proposal meets the requirements of young people across the nation. This would certainly assist issues of rurality and isolation experienced by many young people. In addition, as expressed by a member organisation working with deaf young people, young people ought not to be faced with high roaming charges on mobile telephones e.g. online signers for deaf young people require fast-streaming wi-fi facilities.

5.3 Proposal 6: Improve working with national voluntary youth organisations

5.3.1 CWWYS is pleased that the Welsh Government wishes to explore how it can best support national voluntary youth work organisations and assist them to contribute to Welsh Government priorities.

5.3.2 The opportunity for such organisations to access both core and project-based funding opportunities is overdue and welcome. Recent discussions with the Welsh Government around the National Voluntary Youth Organisation (NVYO) grant scheme have been appreciated.

5.3.3 Specific issues raised were as follows:

- The concentration of emphasis on national organisations is a matter of real concern for local/community-based organisations. This relates directly to this proposal but also to the proposed Funding Structure (page 16 of the Vision Paper) which confusingly mentions 'core funding for national youth organisations on a national and a local level...'. We suggest that this needs urgent clarification.

- Further clarification is requested on the rationale behind the exclusive reference to uniformed organisations in the context of 'strengthening links'.
- The voluntary youth work sector should determine who speaks for it rather than have the decision made for it as a result of a competitive tendering process. Respondents were absolutely clear that they wished CWVYS to retain a stable, strategic and government funded basis for representing and supporting the sector nationally, regionally and locally. Respondents therefore expressed the view that the proposed funding structure should include specific, designated funding for CWVYS.
- The sector would wish to have opportunities to participate in an inclusive decision-making process regarding any plans for the youth service. CWVYS members would expect to be consulted on any potential changes to the current framework.
- As mentioned above, respondents clearly expressed the view that CWVYS is their preferred model for representing the sector and do not see any value in creating 'new arrangements to engage, and facilitate dialogue with, the voluntary Youth Service'.

6. THEME 3: ACCOUNTABILITY AND RESULTS

6.1 Proposal 7: Strengthening the evidence base through a National Outcomes Framework and Quality Mark

6.1.1 CWVYS supports the concept of a National Outcomes Framework to evidence impact and outcomes from non-formal and informal learning. This correlates with work recently carried out by CWVYS and The Young Foundation, with CWVYS members in receipt of training on The Young Foundation's 'A framework of outcomes with young people'. This has been well received by the sector.

6.1.2 The Youth Service in totality is not a 'one size fits all' provision. Data collection can be onerous, which leads to inaccuracies. In order to support the ambitions of this proposal, we would encourage the Welsh Government to develop a simple, low-cost system which collects only valuable data and which incorporates resources to support its maintenance. This corresponds with comments from CWVYS members which highlighted the need to understand capacity issues of smaller organisations in relation to any management information system.

6.1.3 There is a need to recognise important 'distance travelled' and 'softer' outcomes, such as resilience. In addition, there is a value in the 'journey to attain' and not just the final outcome.

6.1.4 On the specific points contained within the proposal:

- CWVYS and the voluntary youth work sector would like to be involved in the development of a National Outcomes Framework. (Note: A draft paper 'Towards an Outcomes and Impact Approach for the Voluntary Sector in Wales' is currently being considered by CWVYS members.)
- We welcome the forming of the proposed Youth Service Reference Group. CWVYS would wish to support and to play a full part in the proposed group on behalf of the voluntary youth work sector.

- The CWVYS Quality Mark (for workforce development) and the ETS Wales Quality Mark (for youth services) already exist and have both been funded by the Welsh Government. Members are clear that the consultation completed on both Quality Marks has resulted in them being 'fit for purpose' and complementary (as a result of co-operation on a joint sector approach). Respondents therefore questioned the need to spend resources on another Quality Mark.
- We would agree that the National Youth Service Audit can be developed to benchmark and identify high-quality practice. It is also suggested that the Audit be used as a tool for extracting case study information. Whilst welcoming the ideas, the sector would not wish the cost of the Audit to impact negatively on funds for youth service delivery.

6.2 Proposal 8: Developing a consultation on statutory guidance

6.2.1 CWVYS is pleased that this proposal highlights issues of such variance in spend between local authorities in terms of use of the Revenue Settlement funds. This not only causes issues for our PYOG colleagues but for the voluntary youth work sector too. The availability of funds to support delivery affects and is affected by the extent to which there is no uniform 'offer' across Wales. The removal of hypothecated funding has ultimately led to young people receiving comparatively far fewer youth work-led opportunities in local authority areas where elected Members choose to use RSG funding for other purposes.

6.2.2 CWVYS welcomes the development of firmer guidance to local authorities in delivering statutory responsibilities for youth work provision.

6.3 Proposal 9: Leadership, oversight and advice

6.3.1 This proposal presents a welcome opportunity to engage more strategically with Welsh Ministers in relation to the new National Youth Work Strategy for Wales and its impact on policy more widely.

6.3.2 The proposed Youth Service Reference Group is a good idea in essence but needs to be strong in character, well resourced, well organised and focused in order to have credibility, not only in the eyes of Welsh Ministers but also for the sector it is seeking to represent.

6.3.3 The voluntary youth work sector wishes to determine who represents its collective voice in order to provide the necessary mandate to participate in the Youth Service Reference Group. CWVYS and also young people are viewed by CWVYS members as being key stakeholders but do not appear to be included in the suggested list of representatives for whom 'engagement is critical' according to the proposal.

6.3.4 Clarification is sought on what is meant by the term 'communities of expertise'. If it implies bodies with experience, knowledge and skills useful in driving forward good youth work practice, then respondents were clear that CWVYS provides such a focus by virtue of its membership and, for example, through the functions and membership structures of its Training Committee and Regional Groups.

6.4 Proposed new funding structure

6.4.1 Youth Service Grant

- Local/community-based organisations expressed serious concerns in relation to the proposed 'Youth Service Grant'. Whilst the proposal may imply greater support at local level, in practice, local organisations may well need to fall into line with local authority developments and this will impact on their ability to raise their voice at a national level. Having said that, some local organisations that have experienced good relationships with their local authorities expressed clear support for any effective means of funding voluntary organisations via their local authorities.
- Respondents suggested that a 'Youth Service Grant' ought to be available for 'The Youth Service' i.e. for both voluntary and statutory agencies. In addition, the focus of the Vision Paper would seem again to be young people NEET and 'priority groups' whereas the sector would wish the emphasis to be on universal provision supported by additional resources for specific needs or groups of young people.

6.4.2 National Voluntary Youth Organisation Grant (NVYO) and National Voluntary Youth organisations targeted project activity.

- CWVYS welcomes the move to ensure that plans for the NVYO grant scheme present opportunities for both core funding and project-based activities from 2015-16.
- It would be useful if the Welsh Government were to define the term 'national' in respect of NVYO criteria.
- Further consultation on the Welsh Government priority policy areas well ahead of future NVYO grant programmes would be welcomed.
- As with the request to provide RSG allocations, NVYO grant values and recipient organisations needs to be tabulated and made available to the wider youth work sector.

6.4.3 Voluntary Youth Service Support

- The voluntary youth work sector would like to have more information as to whether this proposal includes a competitive grant process and whether it would be open to multiple bids to cover each of the four elements as listed or for one organisation to deliver on all elements from 2014/15.
- Additionally, the sector is keen to establish the Welsh Government's rationale for establishing a 'new arrangement' (Proposal 6) to achieve these proposed aims.
- As highlighted previously within this response, the voluntary youth work sector would at all times seek to determine how it is represented and who represents it. The sector is very clear in its overwhelming support for CWVYS to continue to operate as its representative body.
- The suggestion that this proposed support would only be made available to national organisations is a matter of significant concern. The voluntary youth work sector derives its strength and collective voice through the medium of an existing independent, member-governed and autonomous body which represents the whole sector i.e. both national and local/community-based organisations.

- Respondents were clear that strategic representation requires stable and adequate core funding and questioned the validity and appropriateness of competitive funding for this important role.

7. CONCLUSION

7.1 Crucial to the issues, concerns and opportunities expressed in this response have been the considerable and much-valued contributions of CWVYS member organisations and other respondents. The CWVYS Executive Committee would like to thank them for their time, energy, invaluable collective thinking and for the quality of the debate.

7.2 In addition to the specifics highlighted above, the wide-ranging series of debates and discussions have identified the following central themes:

- That whilst the opportunity to consider the *Vision for new national youth work strategy for Wales 2013-18* was very much welcomed by all, the lack of consultation prior to its release was not well received.
- The 'Vision' concentrates largely on services as opposed to youth work, its purposes, principles and possibilities. It tends therefore to focus on targeted provision. There is danger in seeking to separate out both universal/open access provision and targeted work when both elements can and already do co-exist within existing youth work structures. There is an opportunity to build upon this foundation rather than to seek to dismantle it.
- There is a level of sophistication in the delivery of youth work which cuts across universal/open access and targeted provision and which is regularly delivered across a range of sometimes complex issues within diverse environments on the basis of it being available for **all** young people.
- A major challenge for the Youth Service (both voluntary and statutory sectors in partnership with the Welsh Government) is to demonstrate the value of what it provides not only for young people and the adults who work with them but also for the social and economic health and development of the communities and the country in which we live.

7.3 The CWVYS members, Executive Committee, staff and other stakeholders have very much valued the opportunity provided by the Welsh Government to collate this response to the Vision Paper. We would be pleased to provide any additional information or clarification on the issues or comments identified above or, indeed, on any further proposals including the subsequent National Youth Work Strategy.

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11 September 2013

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