

The Children's Society Written Evidence Submission

About The Children's Society

The Children's Society supports vulnerable children and young people (CYP) aged 0-25 in England. We address the mental health and wellbeing of the young people we support in a variety of ways. We provide counselling services, therapeutic interventions for children who have experienced trauma, group work, drop-in services, advocacy and advice services and work with a range of young people including looked after children, care leavers, young carers, unaccompanied and asylum-seeking children, children who are at risk of child sexual exploitation, children using drugs and alcohol and those with mental ill health.

In the last year, The Children's Society:

- Reached 72,016 young people through our services
 - 97% of children and young people supported by our services reported that they were happy with the support they received
 - 92% said that the service had helped or improved their situation
- 13,696 supporters took campaign actions with us to call for change for young people
- Over 3,200 people joined our work by volunteering
- 5,865 parents and carers supported by our services

We also have an extensive programme of research, policy work and advocacy around improving the support systems for children and young people. Our annual 'Good Childhood Report' provides leading insight into children and young people's wellbeing with it being the largest annual national assessment of children's wellbeing. We are leaders in children's subjective wellbeing and provide developing insight into the lives of children and young people facing multiple disadvantages. The Children's Society's ambitious goal seeks to reverse the decline in children's wellbeing by 2030.

Executive Summary

The Children's Society submits this evidence alongside evidence submitted in coalition and partnership, including:

- Our Wellbeing, Our Voice Campaign
The Children's Society have been calling for a national wellbeing measurement programme for over a decade and are a leading member of the Our Wellbeing, Our Voice campaign seeking to achieve the introduction of this programme via the Children's Wellbeing and Schools Bill
- Children's Charities Coalition
The Children's Society are one of five children's charities in the coalition – alongside Action for Children, Barnardo's, NCB and NSPCC. The Coalition led the Children at the Table campaign, emphasising the need for babies, children and young people to be a priority for national Government, embedding their voices in the heart of Government and shifting focus and investment to early intervention.

The Children's Society welcome the Bill as a positive first step in the right direction for children's wellbeing. We welcome a primary piece of legislation with a focus on children, particularly in improving protections for young people alongside unlocking every young person's potential by dismantling the barriers to opportunity.

Primarily, The Children's Society want to see a national wellbeing measurement to be introduced as part of the Bill. The Bill should introduce this programme, recognising the widespread benefits in doing so, to prompt an expert working group to design and implement the programme for implementation – an amendment has been tabled (NC24) to introduce this.

We would also welcome new measures in the Bill to place duties, and provide support for delivering such duties, for the protection, provision and enhancement of play opportunities for children and young people in their local communities.

Alongside those two new measures, The Children's Society would welcome strengthening the Bill in the following areas:

- Single Unique Identifier (SUI) and information sharing
- Education's safeguarding role
- Breakfast Clubs
- Uniform caps

Furthermore, it is imperative to acknowledge that the Bill will not provide a silver bullet for the vast challenges facing the services and support structures for children and young people. The Bill must be supported by a shift in focus and investment towards early intervention.

Finally, The Children's Society would strongly encourage the Bill to adopt and introduce measures to enhance the involvement of children and young people's voices in legislation and Government policy.

National Wellbeing Measurement

This section of the submission should be considered in conjunction with The Children's Society's joint submission as part of the Our Wellbeing, Our Voice collective submission.

The Children's Society conduct and publish an annual report on children's wellbeing, The Good Childhood Report. However, whilst these insights provide a crucial snapshot of young people's wellbeing in the UK, including comparisons with other nations and trends over time, there is an urgent need for a national programme from the Government in order to:

- Widen the programme to capture the wellbeing and voice of all young people (whereas The Good Childhood Report is restricted to a particular sample size)
- Embed the insights and data into local decision-making and commissioning to inform services, target interventions and evaluate the impact of efforts to improve the wellbeing, safety and happiness of young people
- Provide a national overview, including geographic and demographic comparisons, to inform national Government policy

Whilst The Children's Society welcomes the Bill and its focus, provisions to directly understand and improve young people's wellbeing are light, despite being the title of the Bill. The introduction of a national wellbeing measurement within the Bill would provide a strategic framework to underpin all other measures in the Bill, guiding the implementation of such new provisions to truly deliver a child-centred Government with a focus on wellbeing.

The UK's children and young people have the lowest life satisfaction in Europe with 25% of 15-year-olds reporting low life satisfaction, and the gap in life satisfaction between the 25% most advantaged young people and the 25% most disadvantaged also being the largest in Europe.¹

Aside from the moral imperative to improve young people's wellbeing, there are also good economic and political reasons to do so. Closing the gap in wellbeing outcomes between the UK and the Netherlands for secondary school age children would provide around £82 billion in wellbeing benefits every year, based on HM Treasury methodologies.² Even narrowing this gap by just 0.1% would deliver benefits that far exceed the costs of implementing a national wellbeing measurement programme - making it an investment with extraordinary returns. Politically, given that 73% of parents/carers support young people's wellbeing measurement in schools,³ a national programme would demonstrate to them and to young people themselves, that politicians are listening and their future is a priority.

A national wellbeing measurement programme can create opportunities for change to help reverse the downward trends in children's wellbeing and close the gap against international peers. It will allow greater regular tracking of national progress, support detailed service planning within local communities, enable targeted support for groups of young people struggling the most, help school leaders understand how they are performing and support the development of new evidence on what works for improving children's wellbeing.

¹ The Children's Society, The Good Childhood Report 2024

² Pro Bono Economics, Jon Franklin, [The £82 billion question: can we afford to ignore children's wellbeing?](#)

³ Youth Sport Trust, [Parents Survey 2024: PE and School Sport Report](#)

Specifically, the inclusion of a national wellbeing measurement within this Bill would help the achievement of numerous missions set out by the Government.

A national wellbeing measurement can help to break down barriers to opportunity by:

- We know that happier and healthier children achieve better attainment and educational outcomes at school (as well as this being a good outcome in and of itself)
- Existing local examples of wellbeing measurements demonstrate this with OxWell findings resulting in schools and local authorities working together to develop action plans to improve pupils' sense of school belonging; and #BeeWell's work with Football Beyond Borders evidenced an increase in participant wellbeing for pupils at risk of school exclusion, helping to evidence what works for support children to stay in school and keep learning.
- In April to June 2024, 12.2% of young people were not in education, employment or training (NEET), with youth economic inactivity potentially holding £69 billion from UK GDP. A national wellbeing measurement can explore young people's readiness and preparedness for future employment, education or training. Such insight can inform careers advice and wider national efforts to provide opportunities for young people, such as the Youth Guarantee.
- Whilst ensuring a national wellbeing measurement isn't used to form crude league tables amongst schools, the data can equip schools with the knowledge to improve school belonging, work with local partners to improve young people's wellbeing, and provide more basis for discussions, and evidence, with Ofsted.

A national wellbeing measurement can build an NHS fit for the future by:

- Positive mental health and wellbeing in adolescence is the best predictor of those in adulthood. A national wellbeing measurement would enable the shift to prevention, providing insights into both physical and mental health.
- Integrated Care Systems have seen a shift to localised health decision-making, a national wellbeing measurement can provide vital data to inform the work of the Integrated Care Board, and the Integrated Care Partnership.

A national wellbeing measurement can achieve safer streets by:

- The Good Childhood Report 2024 showed that 'crime' is one of the top 2 issues that young people aged 10-17 are worried about. A national wellbeing measurement can inform holistic support to young people, including informing the design, delivery and evaluation of early intervention programmes.
- Creating community approaches to 'safer streets' can be driven by insights from the community with a focus on the relationship between wellbeing and feelings of safety, as well as local community belonging.

[Play Sufficiency & Opportunities](#)

In our National Roadmap to a Good Childhood (2024), The Children’s Society set out “Let Children Play” as one of the six core steps to take to overturn the decline in children’s wellbeing.

Play is far more than a mere recreational activity; it is a fundamental right, as enshrined in Article 31 of the United Nations Convention on the Rights of the Child (UNCRC), which acknowledges every child’s right to rest, leisure, and to engage in play and recreational activities appropriate to their age and development.⁴ The Children’s Society is wholly committed to ensuring that all children and young people have unhindered access to the multitude of benefits that play offers.

Our research shows that young people’s opportunities to spend time with others and engage in a variety of activities, has a strong relationship with their subjective wellbeing. The direct work with young people suggests a significant association between the frequency of various activities and children’s sense of wellbeing. It is important for the importance of play, including both structured and unstructured, to consider the needs of teenagers who are frequently overlooked in the development of public policy in this area.⁵ Research consistently shows that play is essential to children’s wellbeing, fostering physical health, emotional resilience, and social competence.⁶ Furthermore, play serves as a vehicle for creativity and problem-solving, skills crucial to lifelong learning.

The erosion of safe, accessible play spaces is a pressing issue that cannot be overlooked. Data acquired by Aggregate Industries has shown that almost 800 parks have been closed in the last 10 years.⁷ A growing body of research indicates that children today spend significantly less time playing outdoors than previous generations, with just 27% of children regularly playing outside their homes, compared to 71% of the baby boomer generation).⁸ Concerns over safety, a lack of facilities, and the rise of digital entertainment all contributing to this trend⁹; in disadvantaged communities, the situation is even more acute with children frequently facing significant barriers to accessing play spaces due to factors such as poor urban planning and a lack of investment in public amenities.¹⁰

From qualitative research conducted by The Children’s Society at the Young Carers Festival, more than 70% of the 132 young respondents (aged 18 and under) expressed dissatisfaction with the availability and quality of local play areas:¹¹ Key issues highlighted by young people include:

⁴ UNCRC, GC No. 17.

⁵ Saamah Abdallah, Gill Main, Larissa Pople and Gwyther Rees, The Children’s Society (2014), ‘[Ways to well-being: Exploring the links between children’s activities and their subjective well-being](#)’.

⁶ Stuart Lester and Wendy Russell (2008), ‘[Play for a Change. Play Policy & Practice: A Review of Contemporary Perspectives](#)’.

⁷ Aggregate Industries (2023), ‘[FOIs reveal a continuing decline in play park facilities in the UK](#)’.

⁸ Save the Children (2024), ‘[Only One In Four Children Play Out Regularly On Their Street Compared To Almost Three-Quarters Of Their Grandparents Generation](#)’.

⁹ Sandra Laville (2024), ‘[Children suffering due to lack of outdoor play, UK charities warn](#)’; Adrienne Katz and Dr Aiman El Asam, in partnership with Internet Matters (2022), ‘[Vulnerable Children in a Digital World](#)’.

¹⁰ Janet Loebach, Marcos Sanches, Julia Jaffe, and Tara Elton-Marshall (2021), ‘[Paving the Way for Outdoor Play: Examining Socio-Environmental Barriers to Community-Based Outdoor Play](#)’.

¹¹ The Children’s Society, Qualitative Research conducted at the Young Carers Festival 2024.

- The deterioration of existing spaces, with participants noting, “*many of the existing play spaces are in poor condition, and there is a general sense that they are not maintained well.*”
- Concerns about safety, stating, “*There aren’t enough safe and secure play areas,*” and citing insufficient facilities, such as, “*The facilities in the available play spaces are not sufficient.*”
- The lack of accessibility was also a significant issue, with comments such as, “*Many play spaces are not easily accessible,*” and “*Some are far from where we live, and others are not designed to be inclusive for all abilities.*”
- A feeling that young people’s views were neglected, with one participant stating, “*As young carers, we sometimes feel our specific needs and preferences are not considered.*”
- One young person remarked, “*People [are] not listening to me*” when asked how local authorities responded to their requests for improvements, a clear indication that current policies are failing to address children’s needs effectively.

We strongly advocate for the introduction of Play Sufficiency legislation in England, learning from the introduction of the model implemented in Wales and, recently, Scotland.¹² The Play Sufficiency Legislation, introduced in Wales in 2012, requires local authorities to assess and ensure that children have sufficient opportunities for play. It aims to promote children’s wellbeing by mandating safe, accessible, and high-quality play environments as a key part of community planning. In 2023, Scotland introduced similar legislation under the Play Sufficiency Assessment Regulations 2023, which requires local authorities to assess and report on the availability and quality of play opportunities for children in their areas. These regulations aim to ensure that children have adequate, accessible, and safe play environments that support their development and well-being. The introduction of the Play Sufficiency Duty in Wales has significantly advanced the focus on children’s right to play, fostering better partnerships and raising awareness. It promotes an ongoing, collaborative process at both national and local levels, emphasising the creation of supportive conditions for play and ensuring equitable access through a rights-based approach and attention to spatial justice.¹³ Such legislation would place a statutory duty on local authorities to assess and secure sufficient play opportunities for children within their jurisdictions. This legislative framework would provide a much-needed accountability mechanism, ensuring that local authorities prioritise play provision as a fundamental component of child development.

The decline in local government funding has led to a reduction in the maintenance and development of public play spaces.¹⁴ In 2023, FOI requests conducted by Aggregate Industries revealed that nearly 800 playgrounds have closed over the last decade.¹⁵ This has disproportionately affected children in disadvantaged areas, where play spaces are often neglected or underfunded.¹⁶ In 2024, Green Space Index reported that 2.3 million children under

¹² Welsh Government (2024), ‘[Wales – a Play Friendly Country](#)’.

¹³ Wendy Russell, Mike Barclay, Ben Tawil and Charlotte Derry (2019), ‘[Children’s Right to Play in Wales: Six years of stories and change since the commencement of the Welsh Play Sufficiency Duty](#)’.

¹⁴ Karl Martinsson, Damien Gayle and Niamh McIntyre (2022), ‘[Funding for England’s parks down £330m a year in real terms since 2010](#)’.

¹⁵ Aggregate Industries (2023), ‘[FOIs reveal a continuing decline in play park facilities in the UK](#)’.

¹⁶ Field in Trust (2024), ‘[New UK government ‘must address play crisis’ as a third of children in Britain do not have access to any nearby playgrounds](#)’.

the age of nine (31%), live more than a ten-minute walk from the nearest playground.¹⁷ Moreover, UNISON reported in 2024 that 1,243 council-run youth centres had closed since 2010, with just 581 centres remaining as of March 2024.¹⁸ Children's opportunities to play have become a postcode lottery, with those in disadvantaged areas facing the greatest barriers.¹⁹ The Government must address this inequality by ensuring equal access to well-maintained public play spaces across the UK, prioritising investment in areas of high deprivation through ring-fenced funding for local authorities. A renewed commitment to investing in the refurbishment and development of play spaces is required, with particular attention paid to areas of high deprivation. The maintenance and establishment of spaces of play should not rest on the shoulders of individuals, they should be priority projects for communities to invest in.

This work should be underpinned by a National Play Strategy, with a focus on delivering safe and accessible mechanisms for children and young people of all ages to play. This Bill is a pivotal moment and opportunity to reset and enhance play opportunities in the UK to enable children and young people to thrive.

The Children's Society wholly supports measures suggested by Play England, and supported by many others, in amending the Bill to introduce Play Sufficiency legislation and a National Play Strategy.

¹⁷ Green Space Index (20204), '[New UK government 'must address play crisis' as a third of children in Britain do not have access to any nearby playgrounds](#)'.

¹⁸ UNISON (2024), '[Closure of more than a thousand youth centres could have lasting impact on society](#)'.

¹⁹ Equal Play (20240), '[Every Child's Right to Everyday Play: Report 2022](#)'.

Single Unique Identifier (SUI) and Multi-Agency Working

Clause 4 of the bill proposes a new duty on relevant agencies to share information where this information is relevant to safeguarding or promoting the welfare of the child. It also places a requirement on agencies to use a Single Unique Identifier (also known as a consistent identifier) as part of their information sharing.

The clause places a new information sharing duty on a range of agencies including local authority, health, police, justice, along with childcare and education providers. The new duty would require any relevant person to share information about a child, or information about another individual that relates to the child, where they consider that the information is relevant to safeguarding or promoting the welfare of the child.

This duty does not apply if the relevant person considers that the disclosure would be more detrimental to the child than not disclosing the information.

The introduction of a Single Unique Identifier is critical in improving information sharing and preventing crucial details that could protect a child from harm from being lost in the cracks. The Children's Society, as part of the Children's Charities Coalition welcomes these potentially transformative proposals, the introduction of a SUI is something that the coalition has consistently called for as part of the Children at the Table campaign.

Within this, The Children's Society seeks clarity on the implementation and application of the SUI to ensure that it delivers its potential of revolutionising information sharing and child protection:

- Confirmation that a SUI will be assigned to all babies, children and young people
- Clarity on the definition of welfare (wherein the usage of SUI is limited to 'safeguarding and welfare'), and consideration to define this as wellbeing purposes
- Commitment to an indicative timeframe for when the Secretary of State will introduce regulations for the consistent identifier, and that the police, local authorities, health and education services will be required to use it within their systems?
- Enabling the use of the SUI for research and commissioning purposes, alongside a national wellbeing measurement programme, in recognition of the impact that such cohort data can have on improving outcomes for babies, children and young people
- Further details on what guidance will be available to relevant persons and agencies when considering the usage of SUI, including on decisions on disclosure of information

Finally, the inclusion of a SUI forms part of a package of proposals to strengthen multi-agency working in safeguarding and child protection. The Children's Society welcomes much of these measures but would urge the Government to consider making education the fourth statutory safeguarding partner. We know that education plays a critical role in the safeguarding of children and young people, in 2024 referrals to children's social care services from schools accounted for 2 in 10 referrals (Children in Need data, 2024). With that in mind, it is imperative that education institutions are resourced to fulfil this duty.

We therefore encourage the Bill to go further and consider making education a fourth statutory safeguarding partner. Whilst this would require appropriate resourcing and support for education institutions and workforce and would not be a silver bullet, it would be a welcome step in the right direction.

Early Intervention

The erosion of early intervention services in England has been examined in great depth. Spending on early intervention services like children's centres, family hubs, family support services and youth services has nearly halved since 2011, while the numbers of children in care and the associated costs have rocketed. In 2022, the Independent Review of Children's Social Care recommended that an injection of roughly £2 billion was needed across five years to embed a new offer of Family Help, targeting about half a million children and aimed at re-balancing the system towards early intervention.

Increasing the investment in early interventions will reduce demand for high-cost late intervention services such as complex residential care placements. It will result in more families staying together in healthy ways, more children with stable and loving homes to grow up in, and fewer young people experiencing neglect, abuse, exploitation, or harm.

The Children's Charities Coalition produces a report each year analysing spending on children's services across England. The most recent report found:

- Local authority spending on children's services continues to grow at pace and now accounts for more than a quarter of councils' spending power. In 2022-23 councils in England spent just over 12.2bn on children's services an increase of £600mn (5.2%) from the previous financial year.
- Expenditure on early interventions has almost halved while late intervention services has increased significantly. Since 2010-11 overall spending on early intervention services has fallen by almost £1.8bn, a decline of 44%. While in the same period expenditure on late interventions has risen by more than £3.5bn, an increase of 57%.
- Increased spending on the care system is a result of greater demand and growing complexity both of which are consequences of wider social and economic challenges. Greater demand is likely to have been driven by deteriorating socio-economic conditions and the increasing age profile of looked after children. This brings with it additional complexities such as more mental health concerns and risks of extra-familial harm.
- The impact of a failing placement market, growing demand and increasing complexity has been exacerbated by the financial crisis within local government. For local authorities in England, this period of growing need and increased complexity, has occurred against a backdrop of severe and sustained decline in funding. By 2023, core council funding was around 20% lower in real terms than it had been in 2010-11.

The Government has confirmed its intention to rebalance the system towards early intervention. It has committed in the 2025-26 Local Government Finance Settlement to a new Children's Social Care Prevention Grant, worth £250 million. Funding will be allocated by funding formula according to estimated need for children's social care services with the intention to lay the groundwork for the transition to Family Help.

The Children's Wellbeing and Schools Bill includes a number of clauses that strengthen safeguarding and child protection responsibilities, and the arrangements for children who are looked after. However, the government has chosen not to use this opportunity to strengthen legislation on early help. The Children's Society would welcome a statement from the Government on why this opportunity to legislate on early help has not been taken, and what steps will be taken within, or alongside, this legislation to provide the needed shift to early intervention.

School Uniform Caps

The Children's Society have been campaigning on reducing the cost and financial burden of school uniforms on families for a long period of time. We welcome this much needed intervention in the Bill to cap the number of branded items of school uniform to 3 in Primary School and Secondary School, or 4 in secondary school if one of those items is a tie. We would have preferred to see parity across this cap so that secondary schools had the same cap as primary.

With no central scheme or national cap at the moment, there is a postcode lottery for families with some local authorities able to provide grants and others not. The new guidance for schools came into effect in September 2022 and stipulated that schools in England should ensure second-hand uniforms are available.

However, the current guidance and support is failing to provide the support needed. In 2023, we found that parents and carers of secondary school children were paying on average £422 per year on uniform, and around £287 for primary school children. School uniform costs are being another burden on families, and it is also impacting children's education: 22% of parents reported their child experiencing detention for breaching uniform policies and one in eight had been placed in isolation.

Last summer we surveyed parents again and found that two thirds were finding uniform costs unaffordable.

The Children's Society will continue to call for financial burdens to be lifted from families as part of efforts to eradicate child poverty. The Bill's proposals on uniform costs are a welcome step but the caps could be lower – including in creating parity between primary and secondary schools, such a step would be a welcome strengthening of this provision.

Finally, The Children's Society expects for the upcoming Child Poverty Strategy to implement and align wider Government policy to assist family finance.

Breakfast Clubs and School Food

The Children's Society welcomes any efforts to ensure more children have a decent meal and the energy to get through the school day. We also see the advantages of breakfast clubs in providing a childcare solution for parents who are juggling the school run and work.

We are however, concerned that many secondary school pupils from low-income families aren't benefiting from any support and are going hungry throughout the school day.

A particular concern is that the income threshold for Free School Meals has been frozen at the incredibly low rate of a household income of £7,400 (pre-tax and benefits). This means that nearly a million (900,000) children in poverty are missing out on FSM.

Whilst the universal provisions for primary school proposed in the Bill are a favourable ambition, we would advocate for resource to be utilised to prioritise support for low-income families regardless of school age.

Children and Young People's Voice

At The Children's Society, we place children and young people at the heart of our work. We don't just work for young people; we work with and alongside them. Children and young people are the experts in their own lives, if you want to know about children and young people's lives – ask them.

The voices and experiences of children and young people should be heard in a meaningful and impactful way.

Participation is a child's right. The United Nations Convention on the Rights of the Child states that any child or young person has a right to express their views and have them given due weight in decisions affecting them. Participation is not a privilege, and it does not have to be earned; rather, it values children and young people as citizens in their own right. The UK has ratified the convention, and increasingly public services are required by law to take seriously the wishes and feelings of children and young people.

However, this is not just a rights issue. We believe making provision to hear children and young people in a meaningful not tokenistic way will improve policy development and delivery.

That is why The Children's Society have long called for the introduction of a national wellbeing measurement to centre their voices at the heart of local and national decision-making.

Alongside this, we believe that the Government can truly deliver on the aim of placing children at the heart of government by:

- Creating a 'check and challenge' committee of children, young people and the parents and carers of babies, representing diverse communities and needs, that shadows the development and implementation of the 5 government missions, including the development of this bill.
- Cementing the needs and best interests of babies, children and young people to into the bill's development through mandatory Children's Rights and Wellbeing Impact Assessments on all its proposed changes.