

By email: guidancereview@culture.gov.uk

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Consultation on changes to statutory youth work guidance

1. The Association of Directors of Children's Services Ltd. (ADCS) is the national leadership organisation in England for directors of children's services (DCSs) under the provisions of the Children Act (2004). The DCS acts as a single point of leadership and accountability for services for children and young people in a local area, including children's social care and education. We welcome the opportunity to respond to the Department of Culture, Media and Sport's (DCMS) consultation on a review of statutory guidance for youth services.
2. Current guidance for local youth services was published in 2012 by the Department for Education. Much has changed since then, not least the national lead for youth services, which has been located in the DCMS for the last three years. Although the [Civil Society Strategy](#) (2018) recognises that youth work can have a transformational impact on young people's lives, the government hasn't yet articulated a vision for youth services, preferring to promote National Citizenship Service (NCS) as its flagship programme. Without a clear strategy or policy statement, one which recognises the wider benefits of youth work to both the individual and society, ADCS members are concerned that it continues to be 'cast adrift' from wider children's services, particularly education and schools, and that the scale and reach of provision in local areas will continue to diverge without a renewed national focus and dedicated funding.
3. Youth work is rooted in the principles of universal access with the aim of building trusting relationships, improving wellbeing and promoting personal resilience. The reach and diversity of the local youth services offer in most areas has been restricted by a decade of year-on-year budget cuts. School-based facilities, mobile units and dedicated neighbourhood youth centres have been lost, however, some areas have chosen to centralise their offer in a dedicated and centrally located youth zone or youth café. In parallel, the role of the community and voluntary sector, including faith groups, in providing youth services has grown. Without coordination this can lead to gaps as well as duplication at a local level.
4. Youth workers make a valuable contribution to the provision of early help and can signpost children and young people at risk of poor outcomes, or harm, to sources of information and support. Increasingly they are undertaking targeted interventions in localities experiencing high levels of anti-social behaviour and violent crime or working with specific groups e.g. unaccompanied asylum-seeking children or LGBT groups. Detached youth work also lends itself well to efforts to identify and disrupt child sexual exploitation by targeting known hot spots. There is emerging evidence that increasingly younger children aged 11-15 years old appear to be at risk of extra-familial abuse and exploitation by gangs, often linked to wider criminality such as trafficking and modern slavery. The loss of youth services as a result of year-on-year funding reductions for local government has been cited as a key driver ([ADCS, 2018](#)).
5. ADCS has consistently called for the development of a comprehensive strategy for the totality of the children's services workforce. The need to recruit and retain the best staff to support children, young people and their families, is more pronounced than ever. Recent reports in the [media](#) (CYP Now, 2018) suggest that the number of degree-level youth work courses has fallen to its lowest level in a decade due to ongoing disinvestment in the public sector. In light of this, the recent announcement of a new youth work bursary is welcome news, as is the sector-led development of a new suite of youth work apprenticeships led by the National Youth Agency.

6. Up to 95% of the government's youth services budget is spent on the NCS, a four-week seasonal programme aimed at 16 and 17-year-olds. The NCS has established a place in the wider youth services offer, indeed published feedback from participants is largely positive. However, the [National Audit Office](#) (NAO) (2017) has raised concerns about the relatively low level of engagement amongst the total eligible cohort as well as the value for money being achieved from this very significant investment. ADCS members believe more could be done to ensure national contracts dovetail with local provision and providers reach out to the communities that could benefit from participation the most. The need to self-fund some costs is a barrier to engagement for young people from poorer households who are eligible for free school meals, for example, and more could be done to help children in care and those with special educational needs and/or disabilities engage with the programme.
7. In 2018 the NAO estimated there had been an average [49% real terms](#) reduction in central government's funding for local authorities between 2010/11 and 2017/18, during this same period LA spend on youth services fell from £652 million to £352 million. Funding for children's services has been prioritised over other local services, such as environment, culture and leisure, to some extent by local politicians but this headline masks a significant reorientation in spending away from preventative work, such as youth services, towards intensive child protection and safeguarding activities. Funding for youth support services and outreach work is now routinely drawn from multiple budgets which have reduced or have an uncertain future, these include the public health grant, which fell by 25% between 2014/15 and 2019/20 according to analysis by [The Health Foundation](#) (2019) and the Troubled Families Programme, the long term funding of which remains uncertain beyond 2020.
8. A recent survey of funding for LA youth services by the [YMCA \(2019\)](#) evidenced an average 69% reduction in spend although nearly a third of responding authorities will spend 80% less in 2019/20 than they did in 2010/11. Several LAs said they will see a drop of 90% or more. In this context it is difficult to answer some of the specific questions posed in the consultation without a parallel discussion about funding, particularly in relation to sufficiency and a more defined coordination role for the local authority. Similarly, ADCS members absolutely support the involvement of children and young people in the development of local youth offers but this engagement needs to be meaningful and, crucially, followed up with action. Within the current funding context it is difficult to see how children and young people's wishes, if significantly differing to the current offer, can be enacted.
9. The existing guidance recognises that local authorities are best placed to work with a range of organisations and groups, as well as young people themselves, to bring forward a local offer that suits local needs. National prescription is not desirable. It would be helpful if the updated guidance reflected the significant changes in the way youth services are arranged e.g. youth mutuals, co-operatives and community interest companies, the expanded role of voluntary and community groups and had a keen focus on commissioning to reflect the realities of delivery.
10. Members of ADCS welcome the growing recognition of the value of youth services amongst national policy makers and recent funding announcements. We would welcome further discussions with representatives from the DCMS in relation to the points raised in this response via the Association's national policy committees. Please contact the relevant policy officer via katy.block@adcs.org.uk in the first instance.