



Dros ddysgwyr, dros Gymru
For learners, for Wales

Ymateb i Ymgynghoriad / Consultation Response

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Background information about Estyn

Estyn is the Office of His Majesty's Inspectorate for Education and Training in Wales. As a Crown body, we are independent of the Welsh Government.

Our principal aim is to raise the standards and quality education and training in Wales. This is primarily set out in the Learning and Skills Act 2000¹ and the Education Act 2005. In exercising its functions, we must give regard to the:

- Quality of education and training in Wales;
- Extent to which education and training meets the needs of learners;
- Educational standards achieved by those receiving education and training in Wales;
- Quality of leadership and management of those education and training providers, including whether the financial resources made available to those providing education and training are managed efficiently and used in a way which provides value for money;
- Spiritual, moral, social and cultural development of learners; and,
- Contribution made to the well-being of learners.

Our remit includes (but is not exclusive to) nurseries and non-maintained settings, primary, secondary, special and all age schools, independent schools, pupil referrals units, further education, adult community learning, local government education services, work-based learning, and initial teacher training.

We may give advice to the Welsh Parliament on any matter connected to education and training in Wales. To achieve excellence for learners, we have set three strategic objectives:

¹ This act to be replaced by the Tertiary Education and Research (Wales) Act 2022 when the quality provisions are commenced.

- Provide accountability to service users on the quality and standards of education and training in Wales;
- Inform the development of national policy by the Welsh Government;
- Build capacity for improvement of the education and training system in Wales.

This response is not confidential.

Response

Introduction

Estyn supports the introduction of a 10-year national strategy for preventing and responding to child sexual abuse in Wales. Safeguarding children and young people is everyone's responsibility, and it is essential that we work collectively to protect them from harm. We welcome the Welsh Government's engagement with a wide range of appropriate stakeholders including victims of child sexual abuse, in shaping this strategy.

- We believe the proposed long-term objectives and priority actions are generally appropriate. The inclusion of an additional objective to develop a detailed core dataset on child sexual abuse is particularly important. As highlighted in the consultation document, current data collection is insufficient. The actions set out in Section 3 should improve both the scope and quality of data collected, including about protected characteristics, thereby providing a more accurate national picture of abuse. Our thematic reports—'We don't tell our teachers': Experiences of peer-on-peer sexual harassment among secondary school pupils in Wales (March 2022) and Peer-on-peer sexual harassment among 16 to 18-year-old learners in further education (June 2023)—include recommendations for providers, local authorities and the Welsh Government that will support the objectives outlined in this strategy.
- We endorse the emphasis on strong multi-agency collaboration and timely information sharing. Estyn has contributed to the Joint Inspection of Child Protection Arrangements (JICPA) across Wales, where inspectorates worked with local authorities and Health Boards. This model has proven effective in strengthening joint working and improving information-sharing practices, directly supporting the aims of the proposed strategy.
- High-quality training for professionals, volunteers, and others who regularly interact with children and young people is crucial. Such training should enable them to recognise signs of sexual abuse and respond appropriately and promptly when concerns are disclosed.
- Supporting children and young people to develop a clear understanding of healthy and unhealthy relationships is another key priority. The strategy's reference to the mandatory Relationships and Sexuality Education (RSE) element of the new Curriculum for Wales is appropriate. RSE has a critical role in equipping learners to identify safe, respectful relationships and empowering them to report concerns. We also welcome the aim to ensure that children and young people feel confident in reporting concerns. We believe the strategy could be further improved through a stronger emphasis on increasing

confidence of professionals to always and appropriately ensure children and young people's voices are sought and heard where there are suspicions or allegations of sexual abuse.

- Raising public awareness of child sexual abuse and reinforcing community responsibility are essential. Reviving campaigns such as 'Making the Call' will help ensure that individuals understand their role in safeguarding children, both within the home and in local communities.

Consultation questions

Section 1

Section 1 of the document explains Welsh Government's vision:

"All children in Wales live their lives free from the harm of child sexual abuse and all those affected by child sexual abuse are protected and supported across the lifespan".

This section also explains that a whole system approach is required to address child sexual abuse, and this includes prevention, identification, response, collaboration and monitoring and evaluation.

The scope of the strategy is people from birth to end of life who are affected by child sexual abuse and includes all types of sexual abuse. The descriptors for the types of abuse have been taken from work completed by the Child Sexual Abuse Centre of Expertise and the Independent Inquiry into Child Sexual Abuse (IICSA).

The National Action Plan for Preventing and Responding to Child Sexual Abuse, implemented between 2019 and 2022, led to the development of significant resources. This plan required regional safeguarding boards to establish action plans to meet its objectives. Lessons learned from the national action plan and proposed further actions are included in the draft strategy.

Another key driver for this strategy is the recommendations from reports produced by the Independent Inquiry into Child Sexual Abuse (IICSA) including the recommendations in the final report from IICSA to Welsh Government that have been incorporated into the strategy. We intend the strategy to be the delivery vehicle for the recommendations from the final report.

In section 1.6 we have listed the priority actions suggested to us by stakeholders during engagement. These are not the only actions we need to take but stakeholders believe that these priority actions will have the most significant impact on practice around child sexual abuse in the shortest amount of time.

Question 1: To what extent do you agree that to address child sexual abuse in Wales we need a 10-year strategy rather than a 3-year national action plan?

Estyn supports the proposal for a 10-year strategy to address child sexual abuse in Wales, rather than limiting the response to a three-year national action plan. Child

sexual abuse is a deep-rooted and complex challenge that requires a sustained, whole-system approach. A decade-long strategy would provide the necessary stability, continuity, and policy alignment across government and partner agencies to deliver meaningful and lasting change.

A longer-term strategy would enable Welsh Government and partners to embed preventative measures, strengthen multi-agency safeguarding arrangements, and ensure sustained investment in workforce development. It would also provide the time and framework required to evaluate impact, adapt approaches based on evidence, and ensure that improvements are not short-lived but systematically embedded.

Accountability will be critical. Estyn considers it essential that the Strategic Implementation Group reports to Ministers on a biannual basis, providing robust evidence of progress and identifying risks to delivery at the earliest stage. Clear lines of accountability will give confidence that actions are not only being implemented but are also making a tangible difference to children and young people.

From an inspection perspective, a ten-year horizon also provides the opportunity to continue to highlight safeguarding expectations within inspection frameworks, monitor their impact across multiple cycles, and identify long-term trends in safeguarding culture and practice.

The National Audit on Group-Based Child Sexual Exploitation and Abuse (Baroness Casey of Blackstock DBECB, June 2025) highlighted that implementation of the IISCA recommendations in Wales had not been pursued with “sufficient rigour or determination.” This finding demonstrates the risks of short-term, fragmented planning and reinforces the case for a longer-term strategic framework underpinned by determination, discipline, and transparency.

Question 2: To what extent do you agree with Welsh Government’s vision?

“All children in Wales live their lives free from the harm of child sexual abuse and all those affected by child sexual abuse are protected and supported across their lifespan.”

Estyn fully agrees that the Welsh Government’s vision is both appropriate and ambitious: *“All children in Wales live their lives free from the harm of child sexual abuse and all those affected by child sexual abuse are protected and supported across their lifespan.”* This vision rightly places children’s rights, safety, and wellbeing at the centre of national policy and reflects Wales’s commitment to the UNCRC and to safeguard every child.

Estyn particularly recognises the role of education providers in prevention and early identification. Schools and colleges are uniquely placed to build safeguarding awareness, equip children and young people with the knowledge and confidence to speak out, and provide safe environments in which concerns can be identified and acted upon.

Estyn has a statutory duty to advise Welsh Ministers, and through our inspections and thematic reports we provide independent evidence that already shapes national safeguarding policy. This positions us to support the realisation of the vision by continuing to highlight strengths and areas for improvement across education and training providers. For example, our forthcoming thematic report on how schools support healthy relationships will be a helpful baseline.

Question 3: To what extent do you agree with the priority actions listed in section 1.6?

The following actions have been agreed with our stakeholders as a priority, and we believe implementing these changes will make a significant difference to practice in this area and thereby improve outcomes for people in Wales. This is not a hierarchical list, and all the priority actions are of equal importance:

1. Improve the collection, reporting and analysis of child sexual abuse data and use it to inform policy and practice.
2. Raise awareness with children, families and communities, about how to identify and report concerns about child sexual abuse.
3. Encourage open conversations about healthy relationships, sexuality, sexual health, and sexual abuse among children, parents, carers, communities, and professionals.
4. Ensure the multi-agency response to child sexual abuse is supported by robust evidence, is child centred and consistent across Wales by implementing a national pathway for child sexual abuse.
5. Raise awareness of and provide training on the national pathway for proportionate responses to harmful sexual behaviour that was developed under the original National Action Plan.
6. Develop and implement a child sexual abuse training framework in line with the groups explained in the National Safeguarding Training Standards developed by Social Care Wales (SCW).
7. Support practitioners from all organisations to identify child sexual abuse, feel confident to report concerns and those with safeguarding roles to assess and manage risk effectively.
8. Address the challenges faced by services that provide specialist and non-specialist support for children, families and adult victim-survivors to ensure people affected by child sexual abuse can access the right support at the right time for them

Estyn agrees with all of the priority actions set out in Section 1.6. Taken together, they represent a comprehensive and balanced approach to tackling child sexual abuse in Wales, with each action contributing in an essential way towards

prevention, identification, intervention, and support. We particularly welcome the recognition that these priorities are of equal importance and must be pursued collectively to deliver meaningful change.

Improving the collection, reporting and analysis of accurate data is fundamental. To inform policy and practice effectively, data must extend beyond child protection registrations and include information on the protected characteristics of victims and survivors. Equally important is how data is analysed, reported, and used. Without robust analysis and clear reporting mechanisms, data risks being underutilised. Systematic use of data will strengthen decision-making, inform resource allocation, and ensure that interventions are evidence-led. Raising awareness with children, families and communities about how to identify and report concerns, if undertaken beneficially should improve how often instances of abuse are reported. For this strategy to be successful, communication strategies must be inclusive, accessible and consistent across Wales. Information should be available in multiple formats, including different languages, and delivered through channels that reach diverse groups.

Estyn agrees that it is important to ensure that adults working with children in educational providers are trained to encourage open conversations about healthy relationships with members of their communities and between each other. Estyn's inspection framework for maintained schools and PRUs (What we inspect (2024 – 2030) requires inspectors to evaluate how well providers 'support pupils' personal, social development including their understanding of healthy relationships through Relationships and Sexuality Education (RSE)'.

Our inspection of RSE within the new Curriculum for Wales provides a valuable lens on how effectively providers are equipping learners to understand healthy relationships and speak out against abuse. Inspection evidence can therefore contribute directly to monitoring the success of these priority actions.

We strongly support the development of a child sexual abuse training framework aligned to the National Safeguarding Training Standards. Practitioners across all organisations must be equipped not only to identify signs of abuse but also to respond appropriately and confidently. Strengthening training will reduce the risk of concerns being overlooked and ensure timely referral to appropriate agencies.

If you have answered disagree or strongly disagree to any of the 3 questions, please can you explain why and suggest any changes and other priority actions for us to consider:

N/A

Section 2

Section 2 of the draft strategy sets out the evidence base for Welsh Government's vision, the strategic objectives and priority actions we have chosen.

Question 1: Please can you tell us about any other evidence you think we need to consider for the final version of the strategy?

Estyn welcomes the breadth of evidence that has been drawn upon in developing the draft strategy. It is clear that Welsh Government have consulted appropriately with a wide range of organisations and stakeholders, including listening to the voices of children and adult victim survivors of child sexual abuse. They have also undertaken an appropriate literature review and considered best practice from other countries. In addition, full account has been taken of the findings from previous national reports and plans, including most importantly the Independent Inquiry into Child Sexual Abuse (IICSA) report.

In finalising the strategy, it will be important to ensure that this body of evidence is not only acknowledged but translated into clear, measurable actions. Greater emphasis could also be placed on:

- identifying areas where evidence remains limited, such as the experiences of children with additional learning needs, care-experienced children, or those from minority ethnic backgrounds, and commissioning research to address these gaps.
- ensuring that robust mechanisms are built into the strategy to evaluate impact over time, so that lessons can continue to be learned and approaches refined.
- drawing further on the views of frontline practitioners to ensure that the strategy is realistic, deliverable, and supported by appropriate training and resources.

Taken together, these steps would help to ensure that the final strategy is comprehensive, evidence-based, and capable of driving sustained improvements in safeguarding practice and outcomes for children and young people in Wales.

In addition to the sources cited, Estyn's thematic reviews on peer-on-peer sexual harassment (2022; 2023) and our joint inspection work on child protection arrangements offer further evidence of current challenges and effective practice. Embedding this inspection evidence within the strategy will ensure that actions are informed by independent, system-wide findings.

Section 3

Section 3 of the draft strategy sets out the strategic objectives we have identified and the priority actions we will take to achieve these objectives over the 10-year period. These are not the only actions we intend to take under each workstream, however, they are actions that stakeholders have agreed are a priority.

In the delivery structure we propose in section 4, each of the objectives will have a workstream group. The job of these groups will be to develop detailed action plans to deliver the priority actions we have agreed.

The action planning process will be on a 3-year cycle and will be amended and added to as we progress. This will enable us to ensure that any learning we identify is used to inform the next iteration of the action plan.

The 4 strategic objectives we have identified are:

- preventing child sexual abuse
- protecting children when there are concerns identified about child sexual abuse (the multi-agency response)
- supporting children and adults who are affected by child sexual abuse
- supporting victim-survivors of child sexual abuse.

Question 1: To what extent do you agree these objectives are the right ones?

We agree that the 4 strategic objectives are the right ones to help tackle child sexual abuse. Within Section 3 strategic objectives and priority actions, the consultation document outlines appropriately long-term outcomes to achieve and appropriate actions which will need to be taken to achieve the long-term outcomes. Estyn will test the delivery of these objectives through inspection, including evaluating how well leaders create a safeguarding culture, how providers implement effective policies, and how well learners' well-being is promoted in practice.

If you have answered disagree or strongly disagree, please can you explain why and suggest any other objectives for us to consider:

N/A

Question 2: Do you think the actions we have outlined under each of the strategic objectives will help us achieve our overall vision?

"All children in Wales will live a life free from the harm of child sexual abuse and all those affected by child sexual abuse will be protected and supported across their lifespan."

Estyn believes that overall, the actions outline for each strategic objective, as well as the collection of data, have the potential to help Welsh Governments achieve it's overall vision.

Objective 1: Preventing child sexual abuse

Prevention requires equipping children and young people with the knowledge, skills and confidence to understand what constitutes a healthy relationship, and to recognise behaviours that are inappropriate or harmful. We recommend that an additional outcome be included to reflect this explicitly. Within the actions we feel that there should be one to include working with people who identify themselves as being at risk of abusing children, offering early intervention and targeted support to reduce the likelihood of abuse occurring.

Objective 2: Protecting children and young people whatever their all concerns of child sexual abuse

We feel that alongside all professionals having appropriate child sexual abuse training, volunteers in schools and other organisations should be given a suitable level of training to help them identify and respond to sexual abuse. Volunteers and ancillary staff are often the first to notice changes in learners' behaviour. Including them in training and safeguarding pathways will strengthen early identification. It is also important to educate children and young people from an early age in an age appropriate way to understand how to recognise if they have been sexually abused and to develop an openness about sharing concerns with professionals. Access to trusted adults is critical, wherever possible, children should be able to engage with professionals who reflect their background or share protected characteristics, as this can help to build trust and increase the likelihood of disclosure. We believe the actions could be further improved through a stronger emphasis on increasing confidence of professionals to always and appropriately ensure children and young people's voices are sought and heard where there are suspicions or allegations of sexual abuse, rather than just placing the onus on increasing children and young people's confidence to report.

Objective 3: Supporting children and families affected by child sexual abuse

Timely, trauma-informed and accessible support is essential. We believe that within the first long term objective it is important for children and young people affected by sexual abuse to have access to appropriate timely support in their preferred language wherever possible, ensuring that linguistic barriers do not prevent recovery or engagement. Often, providers' ability to safeguard effectively depends on the timeliness and capacity of external support services. Without sufficient provision in local areas, there is a risk that even well-trained staff cannot always secure the help children need quickly.

Objective 5: Data set for child sexual abuse

We welcome the focus on data but stress that datasets must include protected characteristics to ensure a comprehensive understanding of the prevalence and nature of abuse in Wales. The current arrangements for data collection, as outlined in the consultation document, do not fully capture this. The agreed data set needs to be carefully considered to make sure that it represents a more accurate picture child sexual abuse off in Wales. A robust analysis of data needs to be undertaken to help inform policy and practice. Estyn can complement statistical data by analysing inspection findings to identify safeguarding themes and trends that may not be captured in datasets alone.

If you have answered no, do you have any suggestions for actions that you think should be added?

N/A

Question 3: Are the key partners listed in each strategic objective section the right partners for the actions?

Generally, we believe that the key partners listed for each objective are the right partners to help achieve actions.

If no, what other partners should be included:

- Education should be added to Objective 1 as education professionals can play a key role through their strong and trusting relationships with parents and families.
- Community leaders and groups could be added to Objective 2 and 3 as they often have strong and trusting relationships and frequent interaction with members of their communities.
- There are education providers and staff (schools, colleges and youth workers) across Wales who work with young adults, so education should be added to the delivery partners for objective 4.
- For Objective 5, education professionals have a part to play in ensuring that the development of a new core data set for child sexual abuse is robust and useful and so should be included in the list of delivery partners for the objective.

Section 4

Section 4 of the draft strategy sets out how we will collaborate within Welsh Government and with the UK Government to ensure that policy is aligned, in keeping with the values underpinning this strategy and that there is a collective, whole system approach to addressing all types of child sexual abuse in Wales.

To support this whole system approach we will be establishing a Welsh Government internal policy advisory group for Child Sexual Abuse.

This section also sets out our proposed delivery structure for the strategy. Once the strategy is published, we intend to establish a Strategic Implementation group to monitor and evaluate the impact of the strategy. This group will comprise senior representatives from key stakeholder groups including third sector and statutory organisations.

Underneath the Strategic Implementation group there will be a workstream group for each of the strategic objectives. Each of these groups will be chaired by a member of

the Strategic Implementation group and comprise representatives from all key stakeholder groups including adult victim-survivors.

It is also our intention to establish a standing Children and Young People's Forum and a Victim-survivors Advisory group.

Question 1: To what extent do you agree that the delivery structure we are proposing will support us to deliver effectively on the strategic objectives and achieve the vision?

Estyn agrees that the proposed delivery structure is appropriate and has the potential to support the effective delivery of the strategic objectives and the overall vision. The proposed delivery structure for the strategy outlined in appendix 2 is a useful summary of how the strategy will be delivered.

We particularly welcome the establishment of a Strategic Implementation Group with responsibility for monitoring and reporting on progress. This body will be essential in ensuring that actions are delivered in a timely manner, evaluated robustly, and adjusted where necessary.

We recommend that independent inspectorates such as Estyn, Care Inspectorate Wales and Healthcare Inspectorate Wales are given a formal role within the Strategic Implementation Group. Their inclusion would add an objective voice and ensure that delivery is continuously informed by inspection evidence.

If you have answered disagree or strongly disagree, please can you explain why and what you think the structure should look like:

N/A

Question 2: Are there any other actions we should add to the strategy about equality, diversity and inclusion?

Estyn recognises that the draft strategy makes appropriate reference to equality, diversity and inclusion, and we welcome the commitment to embedding these principles throughout. Analysis of current data highlighted in the document shows that there are certain groups of children and young people a greater risk of child sexual abuse. It is important that this information is included in any training for adults who come into contact with children and young people to help them understand importance of recognising potential signs of abuse particularly amongst high-risk groups.

Estyn's inspections regularly report on outcomes for learners with additional learning needs, care-experienced children and young people from minority ethnic groups. Drawing on this evidence can help target the strategy's actions towards those at greatest risk.

We also strongly support the emphasis on ensuring that children and young people can access support in their preferred language. Access to timely, linguistically appropriate services is critical in removing barriers, building trust, and ensuring that all children and families feel heard and supported. Including protected characteristics in the proposals for a new core data set will help strengthen this work should help increase outcomes for groups of vulnerable children and young people affected by child sexual abuse by changing policy in practice.

If yes, please can you suggest what we could include in the text box below

N/A

Question 3: What, in your opinion, would be the likely effects of the strategy on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English.

Ensuring that the Welsh language is treated as favourably as English when addressing the long-term outcomes and undertaking the actions should ensure that the Welsh language is not treated less favourably than English.

Question 4: Could the strategy be formulated or changed to strengthen:

Ensuring that services are available for children and young people and adults to access in the Welsh language should be highlighted throughout the objectives and priority actions. Training for professionals should be available bilingually and ensuring that the importance of providing support for children and young people as well as adult victims of child sexual abuse through the medium of Welsh throughout the country should be stressed when addressing the objectives. This will improve the chance that a child or young person discloses any abuse. As an example, Estyn has identified examples of strong safeguarding practice in Welsh-medium schools, particularly in how RSE is delivered. Sharing this good practice nationally could strengthen bilingual provision and inform professional training.