



Department for
Digital, Culture,
Media & Sport

Statutory guidance for Local Authorities on providing youth services: A call for evidence

Launch date 3rd October 2019

Respond by Midnight, 1st December 2019

Contents

Introduction	2
Who is this for?	2
Issue date	3
Enquiries	3
The response	3
Confidentiality of your responses	3
How to respond	3
Call for Evidence form	5
Section 1: About yourself	5
Section 2: The existing guidance	7
Section 3: Updating the guidance	10
Section 4: Case studies	Error! Bookmark not defined.
Section 5: Using the future Guidance	14
Section 6: Summary	14

Introduction

The government is revising the guidance relating to Section 507B of the Education and Inspections Act, which sets government expectations of (upper tier) local authorities when they are securing services and activities for young people aged 13 to 19, and those with learning difficulties to age 24, with the purpose of improving young people's well-being.¹

The current guidance was last reviewed in 2012.² There have been many changes to how local youth services have been funded and delivered in the last seven years, therefore a revision of the guidance is required. We expect that the review will provide greater clarity of government's expectations, including the value added by good youth work.

The review aims to focus attention on the positive role local authorities can play in the provision of youth services, and ensure the guidance is useful and accessible for those who need it most.

To help us understand better the strengths of the current guidance and where improvements could be made, the government has spoken with groups of young people, youth sector organisations and representatives from the Local Government Association. These conversations have helped to shape the questions in this call for evidence.

It is important to note that as a guidance document the review will not seek to determine exactly what services local authorities should secure nor is it linked to any funding local authorities get to provide services for young people.

This guidance does not place any responsibilities on any youth sector providers who are not part of local government e.g. uniformed youth groups, voluntary sector organisations or other civil society groups.

Who is this for?

- Local authorities
- Other providers of local youth services
- Young people
- Young people's families and carers

¹ <https://www.legislation.gov.uk/ukpga/1996/56/section/507B>

² <https://www.gov.uk/government/publications/statutory-guidance-to-improve-young-peoples-well-being>

Issue date

The call for evidence was issued on 3rd October 2019.

Enquiries

Any enquiries about this call for evidence or the wider review should be addressed to: guidancereview@culture.gov.uk.

The response

This call for evidence closes at midnight on 1st December 2019. The results of the call for evidence and the government response will be published on GOV.UK in early 2020.

Confidentiality of your responses

Information provided in response to this call for evidence, including personal information, may be subject to publication or disclosure under the Freedom of Information Act 2000, the Data Protection Act 2018 or the Environmental Information Regulations 2004.

If you want all, or any part, of a response to be treated as confidential, please explain why you consider it to be confidential.

If a request for disclosure of the information you have provided is received, your explanation about why you consider it confidential will be taken into account, but no assurance can be given that confidentiality can be maintained. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Department for Digital, Culture, Media and Sport will process your personal data (name and address and any other identifying material) in accordance with the Data Protection Act 2018 and, your personal information will only be used for the purposes of this call for evidence. Your information will not be shared with third parties unless the law allows it.

You can read more about what DCMS does when we ask for and hold your personal information in our personal information charter (see [here](#)).

How to respond

Please return completed forms

- **By email:**
guidancereview@culture.gov.uk
- **By post:**
Local Youth Services Team
Office for Civil Society
4th Floor, 100 Parliament Street
London, SW1A 2BQ

Call for Evidence form

Section 1: About yourself

Before you start answering the questions in this call for evidence, please note that:

- It would be helpful if you would first give some information about yourself as context to your other responses. This information is confidential and we will not publish any information that could identify you without your permission.
- You may also want to answer all or just some of the questions. Please add more lines for your written responses as you need them; however do note that responses of more than 250 words will not be read in full.

1. Name

First Name Mala

Last Name Mistry

Please note: It is helpful to have your name if we want to contact you about your answers to the questions in this call for evidence. You do not have to give your name, and your views will be considered whether or not you give your name.

2. What is your email address?

Email address: mala.mistry@local.gov.uk

Please note: It is helpful to have your email address if we want to contact you about your answers to the questions in this call for evidence. You do not have to give your email address, and your views will be considered whether or not you give your email address.

3. Are you happy to be contacted directly about your response?

(Required)

Yes

We may wish to speak to you directly about your responses to help our understanding of the issues. If we do, we will use the email address you have given above.

4. Are you responding as an individual or as part of an organisation?

(Required)

As part of an organisation

5. If you are responding as an individual, how would you describe yourself?

N/A

- A young person
- A family member or carer of a young person
- A local authority elected member
- An officer of a local authority
- Someone who works with young people (please specify)

.....

- Other (specify)

.....

6. If you are responding for an organisation, what type of organisation is this?

The Local Government Association (LGA) is the national voice of local government. We work with councils to support, promote and improve local government. We are a politically-led, cross party organisation which works on behalf of councils to ensure local government has a strong, credible voice with national government. We aim to influence and set the political agenda on the issues that matter to councils so they are able to deliver local solutions to national problems.

7. What is the name of your organisation?

Local Government Association (LGA)

8. What is your role in the organisation?

Advisor, Children and Young People

9. In which local authority are you located?

N/A

We are interested in knowing what the situation is in different parts of the country. Knowing the local authority in which you or activity is situated will help us to understand the context of your responses. If you are a national provider, or if you are

not based in any particular local authority (for example a national charity), then please state this.

Section 2: The existing guidance

10. Prior to hearing about this call for evidence were you aware that local authorities had a statutory duty to secure services for young people with the purpose of improving young people's well-being?

Yes / No

11. Prior to hearing about this call for evidence, were you aware that guidance existed for local authorities on how to carry out that duty?

Yes / No

12. The existing guidance is meant to advise local authorities on what to take into account when deciding what services and activities to secure for young people. How well do you think the existing guidance achieves that?

- Very well
- Quite well
- Not well
- Very poorly

13. Is there anything in the existing guidance which is particularly useful for local authorities when deciding what services and activities to secure for young people?

Yes

If yes, please give details:

The existing guidance recognises that local authorities are best placed to work with a range of local public, private and voluntary sector partners and young people to determine the nature and composition of their local youth offer. We feel this should be retained in the updated guidance so that councils continue to have the freedom to shape provision according to local need rather than being constrained by national prescription. Councils should be empowered to lead, co-ordinate and commission

both universal and targeted youth services that meet the needs of their local communities.

Many of the principles in the existing guidance such as involving young people, ensuring equality of access and providing opportunities in safe environments are reflected in principles outlined in LGA's long-term vision for youth services, *Bright Futures: a vision for youth services*.ⁱ We would wish to see the six principles that we have outlined in the vision clearly represented in the updated statutory guidance.

These are as follows:

1. Youth-led – ensuring that provision is structured around the needs of young people locally
2. Inclusivity, equality and diversity – ensuring that there is equality of access and no young person feels isolated or marginalised as a result of disability, sexuality, nationality, socio-economic status, special educational needs, mental health issues, religion or any other characteristic
3. Respect – ensuring that young people's views are valued and they are actively encouraged to participate in their communities and enjoy opportunities in their local area without any fear of negative stereotyping
4. Quality, safety and wellbeing – ensuring that good-quality youth services are provided by staff with appropriate safeguarding and skill-based training and ensuring that the youth offer helps to keep young people safe, supports their mental, physical and social wellbeing and their access to non-formal learning and recreation
5. Empowerment – ensuring that young people are empowered to engage in employment and training, and play an active role in their communities
6. Positivity – ensuring that services are strengths-based and focused on developing the skills and attributes of young people

The existing guidance places emphasis on ascertaining the views of young people as part of developing a local youth offer. We support this approach but also recognise that it requires considerable time, skills and resources for councils to ensure that a broad spectrum of young people are engaged and empowered to inform the development of services that affect them, including youth services. In order to address this, more resources to employ and train youth workers would need to accompany the updated guidance.

We have worked with the National Youth Agency (NYA) to produce guidance for local authorities on commissioning better outcomes for young people. This publication aims to encourage local authority commissioners to involve young people more closely in the process and consider youth work as one of a range of options, with the key focus on what is the best means of delivery.ⁱⁱ We would hope that updated statutory guidance contains some key messages from this guidance.

In order to develop a comprehensive and inclusive local youth offer, it is important to work with a wider group of local stakeholders such as the local voluntary and community sector (VCS), faith groups, schools and employers and involve them from the outset in shaping what the local youth offer should look like. We commissioned the Centre for Youth Impact (CYI) to develop a new outcomes frameworkⁱⁱⁱ to support commissioners and providers to deliver services that achieve the outcomes young people want, need and deserve. We would encourage all commissioners and providers to use this new framework to work towards a system in which all partners including young people are working together to deliver the same, locally agreed outcomes.

Section 3: Updating the guidance

13. We would like to know in what ways the guidance could be improved. Please tick any of the suggestions below and/or add you own.

I believe the guidance needs to address:

- The leadership role of local authorities in convening key stakeholders, and securing sufficient services for young people in their local area.
- The role of qualified youth workers in leading positive activities for young people as part of a local youth offer.
- The role that other providers, such as the voluntary and civil society sector, can play in providing services for young people.
- The role of partnerships between local authorities and other key partners in providing a comprehensive offer to young people.
- Whether local authorities should have a clear statement of what they think a sufficient offer is for activities and services for young people in their area and how they plan to secure it.
- The quality of the services and activities available to young people as part of their local youth offer.
- The role of young people in deciding what a sufficient local offer is for these services.
- Up-to-date examples, contacts and resources that help local authorities and their communities decide what would work in their area.
- How often local authorities should review their youth offer.
- Expected outcomes for young people and how these could be measured and evaluated.

Please list any missing key areas that you feel the guidance should address here and say why they are important:

- Guidance to support local authorities with safeguarding and health and safety in youth services, particularly in light of increased delivery of services by external providers.
- Best practice on youth service delivery models and key factors to take into consideration
- Information on better commissioning and delivery of youth services. for example, using digital technology

In addition, the accessibility of the language, style and tone of guidance should be considered. A young people 'friendly' version should also be produced and made widely available for young people and key stakeholders in a range of formats.

14. We would like young people to be able to engage meaningfully in decisions regarding a local offer for services. Do you agree?

Yes

If yes, please answer the following questions:

a) At what stage of the decision-making process will engagement with young people have the greatest impact?

Young people need to be engaged at all stages so that they can be proactively inform and influence decisions on services that affect them.

Young people's involvement is particularly important within the planning and evaluation stages. It is crucial that the impact of young people's involvement is measured and evidenced at each stage and that they receive feedback regarding the impact of their involvement.

b) How would you recommend young people are brought into the decision-making process?

There is multitude of ways to engage young people, be it face-to-face contact through forums such as young commissioners, youth councils and children in care councils through to making use of digital and social media. These methods must be discussed with young people themselves to ensure that they meet their needs. The guidance that the NYA has produced on commissioning outcomes for young people offers some information, support and guidance on how young people can be involved in commissioning

services that impact them. It is essential to support and enable representation that reflects the diversity of young people living in our communities and that the views of young people are sought in relation to potential barriers to their involvement and that action is taken to address this.

15. We would like the guidance to provide more clarity on how the services and activities on offer to young people in their local areas contribute towards improving their well-being. Do you agree?

Yes / No

(Question 15 continues on the following page)

If yes, please answer the following questions:

a) What outcomes do you think are most important for young people?

The LGA commissioned the CYI to develop a new outcomes framework to support commissioners and providers to deliver services that achieve shared, locally agreed outcomes. We would encourage commissioners and providers to use this tool as part of discussions to identify which outcomes are most important for their own population. These discussions should also include young people themselves.

The Framework of Outcomes for Young People 2.0 identifies six domains of social and emotional skills that outcomes can be grouped in:

- Responsibility
- Empathy
- Problem-solving
- Initiative
- Teamwork
- Emotion management

b) What types of opportunities, activities or environments should these services provide to help achieve these outcomes?

There is a wide variety of approaches to achieving different outcomes, and the right approach will depend on factors including the young person's skills, behaviours and motivations, and the context in which a service is being delivered. The Framework of Outcomes for Young People 2.0 lists specific types of staff practice that can help to achieve outcomes in each of the domains listed above. Accessibility and affordability is key especially for young people living in more deprived communities where poverty may be a feature of their daily life. This should be explicitly addressed.

Section 4: Case studies

16. Do you have any examples you would like to share of any of the following:

- Local authorities showing clear leadership in setting out what provision will be made for young people in their community and ensuring the delivery of this
- A partnership model working effectively to deliver youth services
- Local authorities meaningfully engaging with young people

Please provide your examples below:

The LGA has commissioned Isos Partnership to consider different youth service models and factors that enable an effective youth service offer. This research will be published following the General Election, and we will be happy to submit this at that point.

Section 5: Using the future Guidance

17. How should any future guidance be more widely publicised?

- On a government website
- On other national youth body websites
- On the website of every local authority covered by the duty
- In spaces for young people e.g. youth centres, community hubs
- Some other way, please specify:

The guidance should be publicised to schools, faith groups, community and voluntary sector forums and youth engagement groups. The dissemination of a young person friendly version of the guidance can support young people in being aware of their rights including what they can expect and how they can contribute to shaping and influencing services that affect them. Consideration should be given to young people who are home educated and a proactive approach taken to ensure that they have access to the guidance.

Section 6: Summary

18. Are there any other reflections or feedback you would like to give?

Local councils are well placed to provide leadership and co-ordination of a local youth service offer working in partnership with other service areas across the local authority and local stakeholders such as schools and the local community and voluntary sector. However, youth services and the ways in which they are delivered has changed significantly since the previous guidance was issued, and it would be helpful for the new guidance to take into consideration the current context and issues facing local councils. Our Bright Futures: Vision for Youth Services outlines a range of ways in which councils can support and lead local youth services, including through safeguarding, and coordination of services and partners.

We welcome the government's recent increased focus on youth services, including the review of statutory guidance and various funding announcements. This is a helpful start to reignite the conversation on how we deliver the best services for young people.

Councils have responsibility for safeguarding the wellbeing of young people in their areas, but as youth services are increasingly provided outside of council services and are not subject to any form of registration or inspection, ensuring the quality and

safety of all provision can be challenging. It would be helpful for the revised guidance to signpost to the Department for Education's forthcoming guidance on safeguarding in out of school settings to support councils and providers in ensuring provision for young people is safe

Funding

The duty currently stipulates that local authorities must 'secure as far as is reasonably practicable, sufficient provision of educational and recreational leisure-time activities for young people.'^{iv} However, ongoing funding reductions set alongside a significant increase in demand for child protection services has meant that councils have had to divert resources away from universal and early help services to support those children most at risk.

Councils have been forced to cut youth services by 52 per cent from £652 million in 2010/11 to £352 million in 2017/18. Furthermore, more than 600 youth centres have closed, and nearly 139,000 youth services places were lost in the UK between 2012 and 2016.^v Many councils do not have sufficient resources to offer a full range of universal and targeted youth services in the way in which they would want. In a changing context, more youth service provision is being offered by the community and voluntary sector and through a variety of delivery models such as Youth Mutuals, but even these are under pressure as council grants continue to reduce and other funding from other areas is continually squeezed.

Scaling back these universal services can mean that opportunities to support some young people are missed. Providers of services for young people have an important role to play in building trusting relationships, which can enable young people to share concerns that they may feel unable to raise with their family or those perceived as authority figures such as teachers or social workers. They can then be directed to the right support or opportunities to help overcome challenges.

Another consequence of funding reductions to local authorities has been a decrease in the infrastructure required to support good-quality youth work. This can mean that even where there is a significant amount of provision available for young people in an area, this can be provided by a range of organisations including the voluntary sector, housing associations and community groups. A lack of coordination can result in duplication, difficulties for young people and their families in finding out what is available, and limited training and support for providers. It is also difficult to know the quality of youth services available when there is limited understanding of the full range of provision across sectors.

Improved coordination of services can help to ensure the safety of young people, maximise uptake, and support genuine collaboration between services and providers to deliver joint outcomes. Local authorities are ideally placed to carry out this role,

but the funding issues have forced them to prioritise more urgent child protection work.

By contrast, the National Citizen Service (NCS) has received the majority of funding from government to deliver youth services. The Government spent £634 million on the NCS – 95 per cent of its youth services budget – between 2014/15 and 2017/18.^{vi} Whilst the programme has been delivered, take-up has been very low. Just 12 per cent (93,000) of eligible youngsters took part in the NCS in 2016, while in some areas take-up was as low as 4 per cent.^{vii} We have also received feedback from councils that NCS has been inconsistent in their approach to working with them. We believe that a portion of NCS funding should be devolved to councils to be spent on year-round provision for young people in their local areas, rather than on a time-limited programme which is restricted to a certain age group and is attracting only a relatively small number of teenagers.

While we welcome the recent announcement by the Government on the £500 million youth investment fund to provide a much-needed boost to the sector, we are keen to work with the government on a more long-term and sustainable funding solution. Long-term investment in youth services can support the early intervention agenda and increased resources will enable the youth services to identify, provide support to and, potentially resolve issues facing young people before there is a need for further escalation or formal intervention by children's services.

The delivery of high quality youth services depends upon having staff with the right skills and training to commission and deliver services and this will require funding and availability of training. The recent announcement of youth worker training bursaries is a positive development and look forward to this being rolled out.

Whilst we welcome the Government's recent announcements on extra funding through, for example, the Youth Endowment Fund and the early intervention youth fund to tackle issues around youth crime, it is unclear whether short-term time-limited resources can have a lasting impact. While short-term funding pots for specific issues are useful ways of focusing attention and galvanising action, they do not allow for the carefully considered, long-term strategic planning that responds to local need. In addition, the time spent applying for such grants is time that could better be spent delivering services. Recent LGA research found that between 2015 and 2017 over 300 separate grants were handed out from national government to councils, representing a significant amount of time and resources spent developing bids. Furthermore, such grants only serve to increase disparities between areas, with some areas receiving more grant funding than others to deliver important services. To deliver effective youth services, long-term, sustainable investment is required.

The lack of co-ordination of youth-related funding pots can also lead to fragmented service offers as funding pots for Police and Crime Commissioners (PCCs) to tackle

preventing youth violence do not necessarily align with funding pots given to local councils. These one-off funds are most effective when there is adequate time for local councils, PCCs or other partners to submit their bids. The funding should be made available, and expected to be spent, within a reasonable time period. Often the bidding process for these funds requires strategic partnership arrangements to be put in place, between local government, the voluntary sector, the police, or wider practitioners. This level of collaboration can take time to establish and the bidding process and funding arrangements should reflect this.

A national vision for youth services

Local leadership and vision should ideally operate within a framework established by an ambitious national vision for young people. The revised guidance should flow from a clearly defined national strategy for young people to clarify what young people can expect and ensure that their voices are heard. This will also help to visibly demonstrate the government's commitment to improving the lives of young people. A clearer national policy direction will also facilitate local councils working with their partners to strengthen the local youth offer and ensure that young people are very much at the heart of shaping services that affect them.

Furthermore, more needs to be done to ensure that youth policy has a high profile across government. All departments, not just the Department for Digital, Culture, Media and Sport (DCMS) should be considering the impact of their policies on young people. There should also be better co-ordination between government departments on the policy priorities for young people so that councils can have greater clarity around expectations and better co-ordinate high-quality, youth-led services.

Overall, we feel that this review has the potential to mark a new approach by the Government towards revitalising youth services and improving outcomes for young people. Next year's Spending Review must include a long-term, sustainable funding solution for councils to have sufficient resources to lead and co-ordinate an effective local youth offer that better serve the needs of our local communities.

Thank you for completing this form. Please return to:

- **By email:**
guidancereview@culture.gov.uk
- **By post:**
Local Youth Services Team
Office for Civil Society
4th Floor, 100 Parliament Street
London, SW1A 2BQ

i LGA Vision for Youth Services - <https://www.local.gov.uk/about/campaigns/bright-futures/bright-futures-childrens-services/bright-futures-our-vision-youth>

ii A guide to commissioning outcomes for young people - www.nya.org.uk/resource/a-guide-to-commissioning-outcomes-for-youth-people

iii https://www.youthimpact.uk/uploads/1/1/4/1/114154335/outcomes_framework_report_final.pdf

iv Section 507B, Education Act 1996

v <https://www.unison.org.uk/content/uploads/2016/08/23996.pdf>

vi <https://www.theyworkforyou.com/wrans/?id=2018-06-14.153871.h&s=speaker%3A24871#g153871.r0>

vii www.nao.org.uk/report/national-citizen-service/