

**Department for Digital, Media, Culture &
Sport (DCMS)**
Statutory Guidance for Local Authorities on
Providing Youth Services: A Call for Evidence

01 December 2019

London Youth
47-49 Pitfield Street
London N1 6DA

About this consultation

On 1st December 2019, the Department for Digital, Media, Culture & Sport (DCMS) closed its consultation on [Statutory Guidance for Local Authorities on Providing Youth Services: A Call for Evidence](#).

About this response

This response is on behalf of London Youth and supported by our 500+ members and associate members. The following members contributed to this response: Metro Judo Club and [Mary's Youth Club](#).

We consulted on this response with young people from [Dare London](#), our youth advisory board.

About London Youth

[London Youth](#) is the body for youth work in London. We are a youth charity on a mission to improve the lives of young people in London, challenging them to become the best they can.

We directly develop the confidence, resilience and relationship skills of over 27,000 children and young people each year through our arts and culture, employability, outdoor education, sports, and youth social action programmes. In every borough of London, through programmes run every day and most evenings and services open to all, our members reach tens of thousands more.

To keep our diverse network of over 500 community youth organisations in London strong, we provide funded opportunities, training and professional development, specialist member networks on issues affecting young people, Quality Mark accreditation, a policy and influencing voice, and research that evidences the needs of the young people and the youth sector.

We can facilitate for policymakers:

- Visits to community youth organisations;
- Consultation on specific issues or programmes with young people and youth professionals;
- Dissemination of opportunities or information to community youth organisations; and
- Young people and youth professionals attending and speaking at events.

Our response

Key messages

- London Youth supports the Department in improving guidance for local authorities in providing youth services.
- A fundamental problem affecting the youth sector in London and elsewhere is a failure by central government to clearly establish the respective responsibilities of central, regional, and local government in England & Wales regarding the strategy, governance, funding, and delivery of youth provision.

- Our members frequently express concern that the duty on local authorities to secure youth services “so far as is reasonably practicable” is not strong enough. London Youth and our members consider that this duty has not been sufficient legal protection to prevent many local authorities from dramatically shrinking their youth offers in response to Government funding cuts since 2011/12. Despite needing to make difficult decisions, many London boroughs have prioritised protecting their youth services or found creative means to preserve them. However, there has been an almost universal reduction in local authority youth provision in London since 2011/12 and some London boroughs have made particularly deep cuts, which has led to a worrying variance in the quality of youth provision available to young people in different parts of London. Due to this, London Youth does not consider that the current guidance or duty provides an effective guarantee of provision to all young people across the capital.
- Alongside improved guidance, we support a strengthened statutory duty on local authorities to ensure appropriate youth provision in every community. We believe that youth provision in the UK should be put on a strong and clear statutory basis, ensuring universal provision, clear responsibility for delivery, appropriate resources and support, and long-term ringfenced funding at pre-2010 levels.
- Central to this should be a clear commitment to high-quality, open access youth work available to every young person in every community.

Section 1: About yourself

1. Name?

Samuel Howell

2. What is your email address?

samuel.howell@londonyouth.org

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

- Yes

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

- As part of an organisation.

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

- 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)

- Someone who works with young people (please specify)

London Youth works with 27,000 young people each year through our arts, employability, sports, and youth social action programmes, as well as our two outdoor education residential centres.

- Other (specify)

London Youth is the representative body for youth work in London. We have over 500 members in our network.

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

The largest membership organisation for youth work in London.

7. What is the name of your organisation?

London Youth

8. What is your role in the organisation?

Policy Officer

9. In which local authority are you located?

London Youth is a pan-London organisation. We frequently partner with and operate within the areas of responsibility of the Greater London Authority, the 32 London boroughs, and the City of London Corporation.

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

- Yes

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

- Yes

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

- Not well

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 / No

If yes, please give details.

- Yes

We take no position on the utility of the guidance to local authorities, other than to note that the guidance allows for a very large variance in provision between different local authorities. Different local authorities interpret their responsibility under Section 507B of the Education and Inspections Act 2006 very differently.

Our members frequently express deep concern about the varying quality of youth provision in different parts of London. For example, the London Borough of Westminster has reduced its youth services budget by 95% since 2011/12 and in 2018/19 spent just £75,000 per year on an under-25 population of 25,074, or under £3 per young person.¹ During the same period, the London Borough of Hackney had a budget of £6.3 million for a population of 90,202, meaning a spend of £69 per young person. To reduce this variance and ensure all young people can rely on a baseline of quality youth services, we would support a national formula guaranteeing a minimum amount of funding spent per young person in each local authority area.

The lives of young people do not correspond to the fairly arbitrary local authority boundaries in London, which they may cross frequently in the course of a day. This issue is particularly pronounced in the Outer London boroughs, where there are less voluntary and community organisations and other infrastructure to account for a reduction in local government provision, and also a dramatic increase in population due to the high cost of living in Inner London.

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:

¹ Office for National Statistics (ONS) (2018) *Mid-Year Population Estimates - Custom Age Tool 1999-2018*; Sian Berry AM (2019) *London's Lost Youth Services*.

- 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.

- The leadership role of local authorities in convening key stakeholders, and securing sufficient services for young people in their local area.
- 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.

London Youth supports the improved guidance addressing all of the areas identified by the Department. We support the six areas we have identified above as a priority because they relate to the following issues:

- The importance of local authorities in convening strategic partnerships and supporting and enabling youth organisations in the voluntary and community sector that are increasingly responsible for delivering youth services.
- The need for a clear baseline of sufficient services available to all young people in all areas.
- The critical importance of young people having a meaningful voice in the quality and type of services that they access.

London Youth strongly supports a clear and enforceable expectation of local authorities to secure a local youth provision offer that is sufficient to local needs. We acknowledge that this may be outside of the scope of this review.

Regarding Section 4d of the current guidance, we would support a more explicit support for open access youth work in the guidance. London Youth considers both open access and targeted youth provision as vital parts of youth work, yet we consider that open access youth work should be prioritised over targeted programmes and should constitute the majority of provision, as it does among our members.

Open access youth work provides the greatest opportunity for early intervention or prevention for any issues that young people may experience. Young people with access to a trusted and knowledgeable youth professional are more likely to recognise problems they are experiencing, be supported with them, and be signposted to specialist services before a crisis is reached. For example, the connection between community youth organisations delivering open access youth work and preventing or reducing serious youth violence is often made.² Greater investment in this sort of prevention would reduce the demand for expensive, specialist programmes that take over after a young person has reached a crisis point. Open access youth work, while flexible, is not unstructured and often includes a programme of activities and development. Research has demonstrated that open access youth work in England can have an observable and positive effect on enhancing friendships, increasing confidence, improving sense of wellbeing, increasing resilience, developing mutuality (in positive inter-personal relationships), and reducing risky behaviours.³

Mary's Youth Club recommended the follow specific changes to the existing guidance:

- Removing the reference to engaging businesses and employers to contribute funding in Section 4b.
- Removing the inclusion of National Citizen Service in Section 4c.
- Strengthening the guarantee of adequate open access youth provision in Section 4d. We know that if the local authorities are given the choice, they focus on the targeting specific problems rather than raising the aspirations of young people.
- Adding clearer guidance to support workforce development, which is needed if the quality of youth work is going to meet the needs of young people and the expectations of stakeholders.

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

- Yes / No

If yes, please answer the following questions.

- Yes

14. a) At what stage of the decision-making process will engagement with young people have

² London Community Foundation (2018) *The Violence Virus*; Youth Violence Commission (2018) *Interim Report*.

³ John Ord et al. (2018) *The Impact of Youth Work in Europe: A Study of Five European Countries*.

the greatest impact?

London Youth strongly support young people being involved in the decision-making process as early and as meaningfully as possible, and for this to be an explicit duty on local authorities.

In our research, we have shown that community youth organisations are successful in embedding youth involvement and youth leadership when they give young people ownership over both the physical space and the activities that they take part in.⁴ A number of different approaches can be used to facilitate this, ranging from formal governance roles for young people within an organisation, to providing open, unstructured sessions where young people choose how to spend their time. An example is Fitzrovia Youth in Action, where the staff team have an explicit open-door policy for the football pitch and playground they manage. This allows young people in Camden to feel that they have their own space in an area where spaces that are accessible to them are extremely limited. They also provide opportunities for young people to take a lead on community events, and in supporting each other, for example, through peer mentoring. These principles are as applicable to community youth organisations as it is to embedding youth involvement in local decision-making.

The young people from Dare London spoke about problems of representation among youth leadership roles with local authorities, such as young mayors or youth councils. They considered lived experience to be most the qualifying attribute in young people in these roles and recommended advisory groups with local authorities that were composed of young people with relevant experience of the issues that they would be addressing. A youth organisation noted that it there was a difficulty in measuring the effectiveness of young commissioner groups, although they did not oppose the model in principle. Both points emphasise the importance of visibility of youth involvement roles that are accessible to young people from all backgrounds.

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

Young people supported the idea of a standing group of young commissioners, who had lived experience of the issues that services were targeting or were representative of local communities. They suggested that these young people should review provision frequently (every 6 months) and should consult young people more widely in the area through surveys.

One young person from Dare London, who has been involved with the Young Lambeth Coop, recommended this as a powerful model. They noted in particular the value of having young people on hiring panels and of standing groups of young people.

The young people we spoke to recommended giving young people a voice in removing services that they considered unacceptable. They suggested a 'secret shopper' scheme with community youth organisations to some other means that young people could express that they did not have faith in a youth organisation.

⁴ London Youth (2018) *"A Space of Our Own": The role and value of community youth organisations in strengthening communities*.

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

If yes, please answer the following questions.

- Yes

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

London Youth considers that all young people should be supported to be the best they can be and to live happy, healthy, and fulfilled lives. To achieve this, we suggest the following outcomes:

- Young people have improved physical, mental, and social wellbeing;
- Young people have improved skills, knowledge, and opportunities to work towards their goals;
- Young people are connected to and valued in their communities;
- Young people have increased diversity, scale, and quality of opportunities available to them; and
- Young people have a voice in the decisions that affect them.

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.

London Youth considers that, while there are some excellent examples of collaboration in London between local and regional government, there are no perfect examples of partnership. From our perspective, the stumbling point is often meaningful involvement of youth organisations in partnerships that are dominated by local authorities and statutory services. We do not feel that this reflects the reality of youth provision in London. Since 2011/12, youth provision in London has increasingly been delivered by the voluntary and community sector due to reductions of local authority's youth service budgets of at least £39 million per year.⁵ We consider that community youth organisations should be strongly involved in all partnerships, as they are vital to delivering services commissioned by these partnerships.

There are growing examples of partnership in London around tackling serious violence. London Youth has been involved in the London Violence Reduction Unit, which was established by the Mayor of London in 2018. We have a seat on their Partnership Reference Group and have

⁵ Sian Berry AM (2018) [London's Lost Youth Services](#).

advised on youth sector involvement through a Practitioner Working Group. While it has not been operational long enough to see an impact on violence, we strongly support the public health approach. Islington has operated an Integrated Gangs Team since 2016 and ‘public health / multi-agency model’ teams with partnerships between voluntary and community groups and the police now operate in the London Boroughs of Hackney, Haringey, Islington, Lewisham, Southwark, and Westminster.

There is a well-established but largely informal partnership between statutory services, the council, and the youth sector in the London Borough of Croydon through the Community Safety Partnership and other initiatives. We are in the final months of our employability programme, Talent Match Croydon, which was built around a partnership of youth organisations, statutory services, and the council.

One young person was strongly in favour of the youth involvement model of the Young Lambeth Coop, which they had been involved in. They particularly supported young people being involved in hiring.

One youth organisation spoke positively of partnership with the Royal Borough of Greenwich. They noted that a strong youth partnership benefited community youth organisations in a number of ways; funding, providing leadership and direction within the local area, providing support other than funding, and connecting youth organisations with each other and with other local stakeholders. They also noted that working in partnership with a local authority helped them to attract other funding. They noted however the increasing demanding relationships with local authorities and national arms-length bodies in terms of reporting and unrealistic targets.

The young people from Dare London were critical of the reduction in youth services over recent years and local authorities’ role in reducing them. One noted that services had disappeared in their local area and that because of this “young people start spiralling, and there’s no one to catch them.”

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.

- 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

We suggest that young people’s rights and expectations of youth services in their local communities could be incorporated into PHSE education delivered in the education system.

One young person from Dare London suggested that information about the guidance should be presented in a single location that was relevant across all of London (or nationally), so that young people knew where to access the information if they moved to a different local authority area. They further said that DCMS should “find young people where they are” to communicate the guidance.

Section 6: Summary

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

Metro Judo Club recommended that responsibility for youth policy be returned to the Department for Education.

The young people from Dare London made a particular point of emphasising the destructive forces of gentrification and unaffordable housing in London. They noted the negative effect this had on young people, communities, and their ability to engage with local services.

Get in touch



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