

Comisiynydd Plant Cymru

Children's Commissioner for Wales

Sally Holland

Dr Dai Lloyd AM
Chair, Health, Social Care and Sport Committee
National Assembly for Wales
Cardiff Bay
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Dear Dr Lloyd

Public Health (Wales) Bill

Thank you for your letter dated 12th January and your request for further information about my evidence on the provisions in the Public Health (Wales) Bill relating to age restrictions for intimate piercings.

In considering my response to provisions around the proposed age restrictions for intimate piercings, much internal debate was prompted within my office around the delicate balance to be maintained between the voice of the child, including ability to consent and protection of children and young people. Government, practitioners and services working with children and young people are duty bound to act in the child's best interests (UNCRC article 3) and there is a fine line to determining the most appropriate age for the restriction of intimate piercings.

In my initial evidence, I tentatively agreed with the introduction of a prohibition on the intimate piercing of persons under the age of 16 years, aligning with Welsh Government's guidance in relation to consent for medical treatment in which 16 and 17 years olds have the ability to consent to medical treatment without the need for their parent's permission. I did, however, confirm that it is important to recognise there are still safeguarding considerations to be addressed in relation to the intimate piercing of young people aged 16 and 17 in relation to their health, safety and welfare.

I have reviewed the stage 1 evidence of the Royal College of Physicians, the Directors of Public Protection Wales and the Chartered Institute of Environmental Health, I recognise the validity of these experts' arguments raised for a higher age restriction in relation to vulnerability of an individual, ability to consent, coercive control, and permanent scarring or damage. I am particularly interested in concerns expressed around potential links to Child Sexual Exploitation, risky behaviours experiences which may lead children to considering an intimate piercing around the age of 16. I would be keen to see further expansion and consideration of information and evidence in this area to inform the development of the Bill moving forward.

Yours sincerely

