

“FULFILLED LIVES, SUPPORTIVE COMMUNITIES”

Consultation Form

FOREWORD

Do you have any comments about the issues raised?

We respond to the four issues raised, as follows:

Issue 1

We are pleased that the current consultation draft recognises the leadership role that Welsh Assembly Government should play in moulding social services, and welcome the mechanisms that have been identified, like the proposed core of universal standards for social services. We fully agree that services need to be rebalanced towards earlier support and prevention. In the long term, this holds out the prospect of greater independence for some vulnerable children and adults, and perhaps some financial savings through avoiding the necessity for emergency, high-cost, last minute interventions. In the short term such rebalancing will require the injection of additional funding, rather than the simple expedient of cutting or reducing services to those ‘with the most intense needs’.

Issue 2

We agree with the proposition that social services should remain a responsibility of local government, if democratic control, local accountability and a real commitment to partnership working can be achieved in all, rather than some, 22 local authorities. Good practice certainly exists in a number of counties, and the process of joint reviews has indicated that some progress is being made, but we are convinced that many of the measures offered in this document must be implemented to ensure consistency and inspire confidence.

To improve collaboration between social care and health, we believe that social service departments must be given more scope to influence the development of local NHS plans.

Issue 3

Though we do not suggest the setting of any arbitrary target, we believe that further encouragement should be given to local authorities to reduce their role as direct providers of social services, so that they may better focus on their planning and commissioning role. Direct service provision absorbs finite management resources, can adversely affect relationships with voluntary

sector providers and experience suggests that it is less responsive to adaptation and evolution.

In the learning disability field, we particularly feel that much day service provision for adults continues to be traditional in design, not person centred, unambitious and tends to still be directly provided by local authorities. We would like to see incentives or mechanisms that allowed voluntary sector providers to propose more appropriate and purposeful services.

We strongly recommend the encouragement and nurturing of not for profit providers as an element in this strategy. A strong voluntary sector is consistent with, and complements Welsh cultural values, and the commonly held sense of what Welsh civil society should look like. Welsh Assembly Government economic policies emphasize the need to develop a 'Made in Wales' economy, and this should extend to a vibrant 'Made in Wales' voluntary sector. Competition, and the flow of ideas from colleagues in the voluntary sector in other parts of the U.K. must be encouraged, but it is a legitimate expectation in macro economic terms, to ensure that the maximum amount of cash spent on social services in Wales, stays in Wales.

Issue 4

We fully welcome the steps that have been taken by Welsh Assembly Government to improve the training, skills and quality of the social care workforce, and the measures outlined in this document.

We reject the assumption that social services has somehow failed to adapt its workforce or to employ "more people to undertake a narrower band of less demanding functions". In the learning disability field, much of the domiciliary care and day care support that adults receive is delivered by staff that are only expected to hold NVQ levels 1 or 2 and are poorly paid, a typical annual salary averaging approximately £13,000 per annum being the norm. Indeed it is our contention that many of the ambitions in this document for service users can only be achieved through the development of a more highly skilled and better paid workforce. It is unfortunately now a cliché to hear the phrase "They can get better paid stacking shelves" in any discussion about recruitment and retention of support workers.

CHAPTER 1 – Vision & Principles

1. Do you agree with our vision for social services in Wales?

We welcome the way in which this chapter has been revised and strengthened. We are pleased that social services should continue to cover children and adults.

We support the statements at 1.03, 1.04, 1.10, 1.11, 1.12 and 1.13.

2. Should it be strengthened or amended in any way?

- 1.06 We are uneasy about the references to social control. We think protection may be a better word. We are not clear why social workers are referred to, rather than social care workers.
- 1.07 The vision statement covers the issues but is not inspirational or person centred. We would prefer a statement that places rights at its beginning and uses some of the good points made in 1.09, i.e. “help people to understand, challenge and overcome their difficulties . . .”. Surely the vision should focus on the outcomes for service users, since local government is no more and no less than the planning and delivery mechanism that helps secure the outcomes. There should be more emphasis on partnership with others in addition to the service users. Particularly for children the cover will be important.

CHAPTER 2 – The Context, the Challenges and the Opportunities

3. Have we identified all the key challenges and opportunities?

We are broadly in agreement with the challenges and opportunities set out, and note the extent to which this chapter has been developed and strengthened.

In the section on the changing policy content, we note that some text has been added about adults. The section remains unbalanced, however, with good, specific and robust statements for children, setting out clear rights and entitlements. The statements for adults seem rushed and glossed over by comparison.

As regards learning disability we would reiterate the concern we have voiced in previous consultations that a substantial challenge is coming in the shape of demographic changes leading to an increased demand for accommodation. There is little or no capital funding in the pipeline to meet this need.

4. Are there any we should add, or give more weight to?

- 2.01 We would again seek clarification that ‘public services’ as described in ‘Making Connections’ and restated here should include services commissioned from the independent and voluntary sectors.
- 2.02 We remain unaware that ‘Designed for Life’ has any specific references that contribute to transforming social services.
- 2.09 We suggest there should be an explicit reference to schools and education being important in the delivery of services to children.
- 2.11 We do argue that children and adults with a learning disability are a unique client group within social care in that they often need assistance and support from birth, right through life. We believe this uniqueness should be acknowledged in this paragraph.

- 2.15 We suggest that the ‘one sector, one workforce’ emphasis and the role being played by the regional care partnerships and the county social care development partnerships should be specifically acknowledged here.
The bald statement about the level of qualifications of direct care staff in the private and voluntary sectors comparing unfavourably with local authorities should be expanded upon. The level of funding provided in contracts does not always allow for adequate training of staff, and meeting costs that arise like substitution cover.
- 2.18 We note there is no reference here to Joint Reviews. The second bullet should refer to the need for person centred planning.
- 2.20 The statement about difficulties in getting support etc. should specify if this relates to all adult client groups.
- 2.29 The first bullet should clarify if this percentage increase relates to children and to adults with a learning disability.
The fifth bullet appears to be making several points and should be clarified.
- 2.31 We would like some breakdown of unemployment by client group, since the rates for adults with a learning disability are particularly high.
- 2.35 We remain puzzled by these statistics for private sector provision. We believe that there are large disparities in these statistics between client groups.
- 2.36 It is not clear whether the references here to commissioning are specific to children’s services, or are more general.
- 2.37 We are not sure that there is yet evidence in place to support the assertion that there is “now leadership” across local government.

CHAPTER 3 – Social Services in 2016 – Change and Development

5. Do you agree with our description of where we want to be in 2016?

We broadly agree with your description of where social services should be by 2016. We particularly welcome the statements in the box on page 21 and paragraphs 3.06, 3.07 and 3.24.

6. Is there an alternative set of outcomes you would wish to propose?

No, but we do have specific comments to make about the following paragraphs:

- 3.04 We suggest substituting ‘adults with impairments’ with ‘adults with social care needs’ in bullet three. We think it important that bullet

five explicitly states that “single interagency workforce development plan” should include all commissioned services.

- 3.06 The whole social care workforce will only feel valued and recognised if identical jobs in the statutory and voluntary sectors carries the same rate of pay.
- 3.10 We welcome the increased emphasis on preventative, early services, but note that current trends towards more restrictive eligibility criteria are working in a contrary direction, screening out people whose needs are less severe or substantial. We are very concerned that this trend should be reversed.
- 3.11 We again reiterate our concern voiced in previous rounds of consultation about the use of the tiered analysis in Figure I. It does not reflect the models of care required by people with learning disabilities.
- 3.12 An additional bullet point should recognise the importance of advocacy options being available to ensure that all users are ‘at the centre’.
- 3.19/3.20 There should be explicit references to schools and to education.
- 3.20 We would ask that the requirement for ‘services to be provided as close to home as possible’ explicitly refers to children and to adults. The other agencies referred to should be spelled out.
- 3.22 We would like an explicit reference to the NSF standard being achieved that all disabled children/young people between 14 and 25 have a key transitions worker.
- 3.26 Should include specific references to all disabled children with mental health needs being able to access CAMHS support and all adults with learning disabilities and mental health needs being able to access psychiatric support.
- 3.29 We fully support the commitment being made to the Welsh language, and to the preferred language of the service user.

CHAPTER 4 - Getting there – the Drivers for Change

7. Have we identified all the key drivers to enable us to achieve our vision?

Yes, we believe that in broad terms you have identified all the key drivers. We would add that more work will need to be undertaken to ensure that the voice of the service user and carer is heard. They will be the best advocates for achieving the vision. We also want the recognition of advocacy as an important driver of change for some individuals particularly those with more substantial or complex needs or communication

difficulties. We are not clear which of the drivers described will achieve a less risk averse approach in services.

8. Will the actions proposed be sufficient?

We offer comments as follows:

- 4.01 We suggest that this paragraph does not fully explain the relationship between an assessment process and good person centred planning. An appropriate assessment process identifies service supports and responses. It should sit within a broader person centred planning process. Good person centred planning with people with learning disabilities can help lift the individual out of being a passive recipient of services, increase their independence, and does not need to be led by a professional. Potentially, person centred planning can be far more empowering than a good assessment process.
- 4.02 We welcome the commitment to improve assessment.
- 4.03 We contend that early intervention for disabled children in this model should be in Tier 1.
- 4.05 Individual budgets. Progress has been made in this area in England under the 'In Control' project for adults with learning disabilities, and we believe that a process of experimentation and development should now commence in Wales. We are in discussion with 'In Control' about what role we could play in Wales. We welcome the action being proposed. Further extension of direct payments would be welcome, but should be supported by more training of social services staff. We again note a comment we have made in previous rounds of consultation. The placing of NHS monies into pooled direct payment funds with social services has been blocked. Given the concerns elsewhere in this document to encourage pooling of budgets, we do not understand why this policy cannot be altered. Research should be commissioned to evaluate outcomes for service users.
- 4.08 We welcome the wider analysis of leadership provided here.
- 4.09 The third bullet assigns responsibility for social service workforce planning to the Director of Social Services. Who will have lead responsibility for one sector/one workforce planning at county level? This is an important point that should be clarified.
- 4.13 We are not sure how the need for joined up planning fits with the Welsh Assembly Government's decision to reduce the number of planning requirements it places on local authorities.
- 4.14 We welcome the commitment to promote new models of commissioning and the much more detailed emphasis on it in this draft as a key issue.

- 4.17 We welcome the review of inspection and regulation functions.
- 4.18 We welcome the use of the aims of the UN Convention on the Rights of the Child to measure partnerships.
- 4.19 We welcome the development of a core of universal standards for social services.
- 4.21-4.26 We warmly welcome the commitments made on developing commissioning practice, and the specific emphasis on a collaborative, partnership approach involving all stakeholders. Our concern will be whether a Welsh Assembly Government approach at national level will in all cases translate into a positive, collaborative culture at local authority level. In 4.26 we would not want to see the bundling of accommodation and core support leading to the loss of tenancy rights for people with learning disabilities.
- 4.29 We welcome the introduction of a 3 year financial planning cycle with local authorities.
- 4.31 Please see the Foreword for our comments about the use of poorly qualified staff.
- 4.32 The invitation to the Care Council to prepare a national action plan is very welcome.
- 4.33 We support the extension of registration to social care workers.
- 4.35 What are the timescales for the sharing of information?
- 4.38 We are pleased to note the recognition of, and funding for research in this draft. We would ask that funding for social care research be ring-fenced and separated from funding for healthcare research.
- 4.40 We particularly welcome the commitment to consider how the new powers of the National Assembly can be utilised.

9. In health and social care in particular is there more that could be done to promote and support joint commissioning and provision of services?

We believe that this is an important and overdue step. Physically requiring the pooling of budgets under 1 budget holder. Also see comment at paragraph 4.05.

10. Which drivers should receive most attention in the first 3 years of this strategy?

Our priorities would be: commissioning, assessment and person centred planning and workforce.

CHAPTER 5 - Implementation

11. Do you have any views on the implementation process outlined here?

We support the broad framework outlined, and the steps to align it with 'Designed for Life'. Clearly more detail, and timescales need to be provided.

12. How can we best ensure that all those with a key contribution to make are included?

By ensuring that the development of the Strategy is underpinned by a good Communications Plan and that all key agencies and organisations are encouraged to participate.

Learning Disability Wales is very willing to play a role in contributing directly and networking with its members.

13. Have we correctly identified in this Chapter the areas which require priority attention in the first 3 years of the Strategy? If not, what is missing? What might be deferred to a later phase of the developmental cycle.

Yes.

GENERAL CONSULTATION QUESTIONS

14. Have you any suggestions to make about how to engage service users, carers, communities, employees and other stakeholders in the culture change needed to deliver this vision of social services of the future?

See question 12 above.

15. Have you any proposals about how to achieve effective implementation of the actions outlined in this document?

Welsh Assembly Government must ensure that they establish a well resourced project team that can drive implementation forward, effectively implement the communication plan and do the necessary networking.

16. Do you have any other comments?

We normally make the comments we receive publicly available. Please check the following box if you **agree** that we can make your comments public.

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*Please return this form **by 15th November 2006** to Consultation: Social Services Directions, Older People and Long Term Care Policy Directorate 1, Welsh Assembly Government, Cathays Park, Cardiff, CF10 3NQ. Alternatively, you can e-mail it when completed to natalie.kemp@wales.gsi.gov.uk. If you have any queries about this form, or about the Assembly Government's draft Social Services Directions Paper, please write to us at the address above or get in touch with Jonathan Isaac on (029) 2080 1089 or at jonathan.isaac@wales.gsi.gov.uk.*