

## **Learning Disability Wales**

### **Response to the Consultation Paper ‘Iechyd Meddwl Cymru (IMC); a Well Being and Mental Health Service Fit for Wales’ by Michael Williams**

Learning Disability Wales’ mission is ‘creating a Wales that values every child and adult with a learning disability.’ We are the umbrella organisation for all voluntary organisations in Wales active in the field of learning disability and represent over 100 organisations.

This response details our concerns about the paper and the proposals it makes, and is therefore reactive. In a second response, made collectively by All Wales Forum of Parents and Carers, All Wales People First, Learning Disability Wales and Mencap Cymru, we set out an alternative proposal. We have also contributed to and support the response made by the Ministers Learning Disability Implementation Advisory Group.

We do not have the experience, knowledge or remit to comment upon the merits of the proposals for mental health services, other than in the instance of individuals with a dual diagnosis of mental illness and learning disability.

### **Summary**

Learning Disability Wales sets greater store on achieving its mission, and its aspirations for children and adults with a learning disability, than on slavish support for any one model of service organisation and delivery. We therefore welcome Prof. Williams willingness to think radically, and to offer a new perspective.

Learning Disability Wales has considered these proposals carefully, consulted on them with our trustees and members and conferred with professional colleagues in Wales and the three other U.K. countries. We have concluded that the proposals;

- lack any analysis, evidence base or rationale about the adequacy or otherwise of learning disability provision
- will not provide seamless services for adults with learning disabilities since so many of the services and support that they need in daily life will continue to be provided by agencies and organisations outwith the IMC, particularly local authorities
- exhibit no understanding of the complexity of disaggregating, safeguarding and transferring of funding for learning disability commissioning and services from 22 local authorities, the existing NHS trusts and LHBs
- are inconsistent in that children with learning disabilities will continue to have their health needs met by the generic NHS trusts and their educational needs met by local authorities
- offers no comment at all on, and therefore no reassurance, that the needs of people with a dual diagnosis of a mental health and of learning disability will

be any better met by a mental health focussed organisation than current mental health services

- run entirely counter to 25 years of Welsh policy activity to ensure that learning disability services are fully shaped by an approach emphasizing the social model of disability and person centred planning
- will actively undermine attempts to widen access to generic, mainstream services by people with learning disabilities
- ignore the recent damning inquiries in England about the abuse of people with learning disabilities where their services were commissioned and provided by NHS trusts
- removes democratic, local planning and control

and most significantly and regrettably;

- were not based on any discussions or consultations with individuals with a learning disability or their parents or carers.

### **The Rationale for the Proposals**

The paper envisages one monolithic all Wales organisation, IMC, planning, delivering and commissioning a startling range of services. These include; adult mental health, CAMHS, learning disabilities, substance misuse, dementia, health promotion, eating disorders, forensic services and diversion from custody for offenders, pre- and post- natal depression and health and well being in the workplace.

Out of the 24 page report, and 118 paragraphs, only 4 paragraphs refer to learning disabilities. No evidence of deficiencies in current learning disabilities is provided, no rationale of the need for change is made, no identification of possible options established and no explanation of the merits of the IMC model for people with learning disabilities is offered. A hugely disruptive and complex upheaval in services therefore has no rationale.

The central focus of the proposals is clearly about mental health, and are framed to meet perceived deficiencies in that field. The majority of people with learning disabilities do not have a concurrent mental health issue and are not unwell. Since 1984, and the launch of the All Wales Mental Handicap Strategy, learning disability services have developed in a very distinctive and separate manner to mental health services, with the leadership role explicitly assigned to local authorities.

Putting learning disability services into the mental health dominated IMC would;

- perpetuate public confusion between mental health and learning disabilities and raise further barriers to the inclusion of people with learning disability into society
- inevitably lead to learning disability issues and services having a second class status within the new organisation.

## **Learning Disability Policy and Services**

Learning Disability Wales wishes to fully restate its support for the direction that policy has taken in Wales since 1984. The initiation of the All Wales Strategy marked Wales out as being at the forefront of the fight to assert the right of people with learning disability to enjoy the same rights as citizens as the rest of the population and was recognised across Europe as an approach to be emulated by other countries. It provided the template for campaigners in the other nations of the U.K. and the development of general community care policies.

Progress in the last 25 years has not been achieved without difficulties or set-backs. Local authority performance has varied. There is, however, a strong culture of partnership working in most counties and an improving range and quality of community based services that increasingly recognise, and listen to, the voice of the individual with a learning disability and to their parents and carers. In contrast with the mental health field, the major learning disability 'hospitals' have been closed and it is unexceptional for a person with a learning disability to live independently with the tenancy rights to the accommodation they live in.

There have also been tangible signs of the greater inclusion of Welsh people with learning disabilities into their community and accessing generic services. The annual health check now offered by Welsh G.P.s to all adults with a learning disability on their patient list, again a U.K. first, is a prime example of the progress being made.

To address weaknesses in learning disability policy in Wales the Ministers Learning Disability Implementation Advisory Group prepared a draft action plan, and forwarded it to the Welsh Assembly Government some months ago for consideration. We note the input to its preparation by individuals with learning disabilities, parents and a substantial number of experts with many years commitment to this field. We commend its content and would welcome an early response.

Learning Disability Wales  
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