

Number: WG23315



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Consultation – Summary Report

Regulations and codes of practice in relation to Part 3 of the Act, on Assessment, and Part 4 of the Act, on Meeting Needs, including care and support planning and direct payments

Regulations and code of practice in relation to Parts 3 & 4 of the Act - Consultation Summary

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Section 1

Introduction

The Social Services and Well-being (Wales) Act 2014 (“the Act”) received Royal Assent on 1 May 2014. The Act forms the basis of the new statutory framework for social care in Wales.

A consultation was held on the proposals for regulations and codes of practice in relation to Part 3 of the Act, on Assessing the Needs of Individuals, and Part 4 of the Act, on Meeting Needs, including care and support planning and direct payments. The consultation period ran from 6 November 2014 to 2 February 2015.

As well as being made available to the wider public via the Welsh Government internet pages, the consultation was distributed to:

- Welsh Local Government Association (WLGA)
- The Children’s Commissioner
- The Older People’s Commissioner
- Social Services Improvement Agency (SSIA)
- Local Government representatives
- Third Sector Organisations
- Local Authorities
- Care Council for Wales

The consultation was also distributed more widely through our communications network to ensure full scale coverage of stakeholder and partner organisations. This extensive network includes:

- Local Authorities
- Association of Directors for Social Services Cymru
- Care Council for Wales
- Care and Social Service Inspectorate Wales
- Wales Council for Voluntary Action
- Welsh Local Government Association
- Children in Wales
- Social Services Improvement Agency
- Care Forum Wales

The consultation and engagement process was underpinned from the start by a commitment to working with people to help shape the implementation and deliver the practice and culture change being driven forward through the Act. Many people helped us to develop the policy instructions, regulations and codes of practice on the Social Services and Well-being (Wales) Act.

Technical groups were established to discuss and debate and work with Welsh Government to help shape this work. The composition of these groups spanned the care sector, and beyond, to encompass local authorities, health, voluntary and independent sectors, user led organisations, banks, and youth justice to name just a few.

Discussions were held with the “Alliance of Alliances” – voluntary sector organisations brought together and supported by the WCVA – about the best way to get citizens directly involved to share their views. Officials worked with a broad range of organisations to help bring together people who use services and carers to get their views first hand about what mattered to them and what needed to change.

As well as formal consultation, using various formats, officials gave presentations to groups, held discussions, attended one to one meetings, encouraged people to invite them to their existing meetings, and wrote articles and gave them to our partners to use within their networks. Stakeholders were asked to share information with their networks and feed back to Welsh Government and open offer to work directly with people.

The National Social Services Citizen Panel was asked to consider the consultation as individuals within their own networks, but also together as a Panel, where they produced reports to inform the consultation on integration, safeguarding, direct payments and paying for care.

Focus groups were held, with invaluable support from many organisations who brought people together to share their views. These included WCVA, County Voluntary Councils, Children in Wales, Voices from Care, and Community Lives amongst others. Officials spoke about the Act, the Regulations, and the Codes of Practice at meetings and events – for example with local authority social services, health, prisoners and their families, and housing.

As well as key contacts being encouraged to disseminate the consultation documents amongst their networks, to support wider engagement, Easy Read and children and young-people friendly versions were also produced and disseminated.

In total 103 responses were received. A list of respondents is attached at Annex A. A summary of consultation responses together with Welsh Government analysis can be found in Section 2.

Background

The Welsh Ministers have made it clear that they wish the core elements of the new statutory framework to be in place for April 2016, when the Act will be implemented.

The statutory framework will consist of three main elements, the Act itself, regulations made under the Act, and codes of practice/statutory guidance. These three elements work together to form the framework within which social services will operate from April 2016.

The consultation on and laying of the regulations to be made under the Act is being undertaken principally in two tranches. This consultation formed part of the first tranche. The intention is to lay these regulations before the Assembly in May 2015 to give the health and social care sector the maximum amount of time to adjust to the new requirements ahead of implementation in April 2016.

The evidence for change

Social services are at the heart of Welsh public life. They support 150,000 young, old and disabled people every year to achieve their potential and help make them safe. Many of these services are delivered in partnership with others, including housing, health and education services. Society is changing and social services must change in response. There has been and will continue to be shifts in the public's expectations of social services, as a result of demographic change and changes in our society. Social services need to alter and to respond to all of these.

Furthermore, demand is rising across social services, yet the financial outlook for all public services is difficult. Whilst we have protected social services expenditure, we need to make a more fundamental change than just pursuing the obvious efficiency measures if we are to make social services sustainable. Our White Paper *Sustainable Social Services for Wales: A Framework for Action* sets out a programme of change to meet these challenges based on the following nine principles:

- A strong voice and real control
- Supporting each other
- Safety
- Respect
- Recovery and restoration
- Adjusting to new circumstances
- Stability
- Simplicity
- Professionalism

These have been informed by discussion with stakeholders and debates in the National Assembly for Wales and elsewhere since *Sustainable Social Services for Wales* was published. They sit alongside the evidence of the

Independent Commission on Social Services in Wales, the Law Commission review of adult social care legislation^a, and our Review of Safeguarding^b. All this forms the backbone of our case for change.

This evidence, and the process of considering it through the Assembly scrutiny process on the Bill, has informed and shaped the contents of the Act. The next stage, the development of the regulations and codes of practice or statutory guidance, has been informed by key strategic inputs such as *More than just words*, our Strategic Framework for Welsh Language Services in Health, Social Services and Social Care^c, the *Enabling Wales* project which directly supports the delivery and implementation of the Welsh Government's *Framework for Action on Independent Living* and by evidence sourced through technical groups consisting of key stakeholders. These groups have looked at the Act's provisions, and the policy underpinning these, in detail, and provided advice to officials on how the regulations and codes of practice should be framed in order to achieve the aims of the Act and, through this, the requirements of *Sustainable Social Services: A Framework for Action*. Welsh Government officials drew upon this valuable input to develop the draft regulations and code of practice which were consulted upon.

The proposals for consultation

Assessment

The Act creates a right to an assessment for people – adults, children and carers – where it appears to the local authority that the individual may have needs for care and support (or support needs in the case of a carer).

The aim is to simplify the assessment process so that it is proportionate to the needs of the individual and considers the person's circumstances in the round.

The framework for all assessment, simple and complex, sets a national minimum core data set followed by an analysis of **5 inter-related factors** to ensure that local authorities consider the person's circumstances in the round whilst ensuring that the depth of analysis is proportionate to their needs.

A **simple assessment** may only require use of a common local template, which may be undertaken when a person accesses the Information Advice and Assistance Service. A more **complex assessment** will include the simple assessment and additional specialist assessments to form a more

^a <http://lawcommission.justice.gov.uk/areas/adult-social-care.htm>

^b <http://wales.gov.uk/topics/health/publications/socialcare/reports/advisory/?lang=en>

^c <http://wales.gov.uk/topics/health/publications/health/guidance/words/?lang=en>

comprehensive integrated assessment. At the end of all assessments the person must have a clear understanding of the **outcome** of the assessment and what will happen next.

The assessment process is integral to the wider system of care and support and the eligibility test flows naturally from the assessment process.

Eligibility

The eligibility framework set out under the Act creates an enforceable right for the individual, where the local authority must consider what could be done to meet needs, and then determine whether any of the needs meet the eligibility criteria and therefore must be met by the local authority.

Through the new model of social care the eligibility model will remove the traditional threshold for access to managed care and support and replace it with a more responsive model that considers an individual response for each person.

Determining eligibility is not about giving a right to any one service; it is about guaranteeing access to care and support to meet well-being outcomes. In the new model local authorities will address the needs of their populations through targeted early intervention and prevention to reduce the demand on more intensive support. However, where these services do not meet the care and support needs of the person a care and support plan will be developed.

Care and Support Plans

A care and support plan is created when an assessment identifies that services cannot be delivered without a plan or where the service can be delivered without a plan but the individual needs on-going support to access these services.

A care and support plan **must** identify the personal outcomes and set out the best way to help achieve them. It is not the intention to try to replace existing local and specialist arrangements for care and support planning, nor to require a single national template for a 'care and support plan', although there will be certain minimum requirements about the content. The complexity or severity of the individual's need will determine the scope and detail of the care and support plan and the range of interventions.

Where there is a plan in place for the individual that meets the requirements of a care and support plan it can be considered as meeting the duty of the local authority.

Where the care and support plan involves visits to the person's home for the purpose of providing care and support, those visits **must** be of sufficient length to ensure the appropriate delivery of the care and support.

Direct payments

Direct payments are monetary amounts provided by local authorities to individuals, or their representatives, to enable them to meet their eligible care and support needs. Direct payments empower people to have choice and control over the way in which their care and support needs are met, which complements their existing support mechanisms to achieve their desired well-being outcomes.

Direct payments replace care and support provided directly, or commissioned by, a local authority. They can be for all, or part, of a person's care and support needs. In the latter case the remainder of their care and support needs will be met in an alternative manner.

Our proposals will see a continuation of direct payments as a means of achieving people's well-being outcomes but in a manner which enhances their ability to determine the care and support they consider is right for them. Also, our proposals will secure the extension of the availability of direct payments for other forms of care and support (for example for long term residential care) and to individuals who are currently excluded from receiving direct payments (for example those with drug or alcohol problems).

Consultation Events

Two consultation events were held as part of the consultation process. The purpose was to:

- Promote engagement with the consultation
- Provide a base level of understanding of the areas we were consulting on to key stakeholder groups.

Attendees were asked to participate in discussions on the implementation of the regulations, and also to share information from the events with their wider networks to provoke deeper engagement with the proposals and a wider span of consultation responses.

The first event was held on 26 November in the Liberty Stadium, Swansea. The second was held on 9 December in Venue Cymru, Llandudno.

Overall the uptake of spaces for the events was positive with capacity reached at both. There were approximately 170 attendees at the event in South Wales and 90 attendees in the North Wales. The range of stakeholders included representation from:

- Age Alliance Wales
- British Deaf Association
- Cardiff Metropolitan University
- Care Council for Wales
- Carers Trust Wales
- Cartrefi Cymru
- Children in Wales
- College of Occupational Therapists
- CSSIW
- Disability Wales
- Estyn Llaw
- G4S Custodial & Detention Service
- Hafal
- Headway
- HMP Swansea
- Learning Disability Wales
- Local Authorities
- Local Health Boards
- Ministry of Justice
- National Probation Service – Wales
- NOMS in Wales
- North Wales Police
- North Wales Social Services Improvement Collaborative
- Office of the Older People’s Commissioner
- Public Health Wales
- The Rowan Organisation
- RNIB Cymru
- Safeguarding Advisory Board
- Shine Cymru
- South Wales Police
- UK Home Care Association
- Wales Alliance for Citizen Directed Support
- Wales Community Rehabilitation Company
- Welsh Ambulance Service
- WLGA
- Youth Justice Board Cymru

Workshops were held at the events on each of the parts out to consultation. The content of the workshops was varied and tailored to suit the subject matter, but at the core of each was a presentation from officials and group discussions and activities.

Section 2

Response to the Consultation Questions

Question 1:

	1. To what extent do you agree that the approach to eligibility, assessment and care planning is clear and simple to apply?				
	Agree	Tend to agree	Tend to disagree	Disagree	Not ticked
Total -	8	35	15	9	22

Summary

The responses supported the approach to eligibility, assessment, and care planning with general agreement that it is clear and simple to apply. There was strong support for this statement from both statutory services and voluntary organisations. However, within the more detailed comments there were specific issues raised which expressed some of the areas of concern from respondents.

Although the overall approach to eligibility was supported responders wanted further clarity about the 'Can and Can only Test' and further guidance to ensure the test will be applied consistently.

Many responders recognised that the approach requires a whole system change for the sector and the success of the approach will be dependent on a significant culture shift.

The Older People's Commissioner for Wales and groups such as Age Cymru and the Alzheimer's Society were clear that they wanted to see a stronger reference to advocacy within the assessment process. This was also reflected in responses to consultations on other parts of the Act.

The groups representing Disability commented on terminology used in the Codes, seeking more overt reference to the social model of disability and making specific reference to Transforming Social Services: Towards an Enabling Wales Toolkit.

It was clear that many respondents were unclear about the status of informal carers and the impact of the care they provide on the determination of eligibility. This relates to text in both the regulations and the code. Carers' groups emphasised the importance of responsive support to meet carers' fluctuating abilities to meet the needs of those they care for and were concerned that there will be a tendency to assume that carers can meet the needs of those they care for.

Welsh Government response

The support for the approach within the responses demonstrates the benefits of working with stakeholders in developing the proposals set out in the consultation. The comments are particularly helpful in enabling the Welsh Government to amend the regulations and codes of practice to offer further clarification in some key areas.

To ensure there is greater consistency across Wales the code on Part 3 will be amended to require the application of a national template in all local authorities during the assessment process. It is also proposed that where, through the assessment, a local authority decides that a need will not be met by a care and support plan there will be a requirement for local authorities to identify in the record of assessment how they consider the proposed action will help someone achieve their personal well-being outcomes. This will give citizens a statement on which to base any disagreement on how best they can be supported to meet their identified personal well-being outcomes.

In addition, the code of practice on Part 4 will be revised to ensure that there is greater clarity in how the approach to eligibility will work in practice. This will include setting out the process by which the eligibility decision is made through the assessment of needs and the situations where eligibility is established intrinsically by the status of the person's presenting circumstances – such as being a looked after child or someone who is at risk of abuse, neglect or harm.

The Welsh Government has commissioned the Care Council for Wales, as the lead body for workforce development, to lead on the development and implementation of a national learning and development strategy. The Care Council has developed this work with key stakeholders to ensure we have a strategy which covers all of those involved in the provision of social care, together with their key partners, and that it is delivered jointly and in collaboration with those partners. This will also address some concerns about inconsistency and the culture shift that is required to enable the success of the new system.

Following the development of a national approach to advocacy under Part 10 of the Act the references to advocacy will be strengthened throughout the codes.

The Welsh Government accepts that terminology in the code can be further amended to be consistent with the social model of disability and direct reference will be made to the Transforming Social Services: Towards an Enabling Wales Toolkit.

The Welsh Government has worked with stakeholder representatives (including Carers Wales) to refine the wording in the code of practice for Part 3: *Assessing the Needs of Individuals*. This will set out that through the assessment the local authority must identify those needs which would be deemed as eligible if a carer was not meeting those needs. This is so that the local authority is able to respond appropriately and quickly where the carer or

the child's family becomes unable or unwilling to meet some or all of the identified care and support needs. This approach will provide the necessary statutory force to ensure that local authorities do respond to situations where a carer is unable to continue providing care. The point at which a carer is unable or unwilling to carry on meeting a care need, or informs the local authority that this is about to happen, will constitute a significant change in circumstances for the cared for person. As a result the local authority must undertake a re-assessment of the person's needs for care and support.

Question 2:

	2. To what extent do you agree that the terms and definitions of the 5 Elements of Assessment set out in the Annex to the code on Part 3 (assessment) are clear?				
	Agree	Tend to agree	Tend to disagree	Disagree	Not ticked
Total -	17	37	6	5	22

Summary

In general responders were in agreement that the terms and definitions of the 5 elements are clear. Statutory partners in particular stated that they found the terms and definitions to be clear. Five of the six Health Boards who responded that they felt the terms and definitions were clear whilst no local authority and only one voluntary agency disagreed with the statement. However some responders wanted further guidance on assessments and the application of the 5 elements.

The North Wales Disabled Children's Social Services Manager's Network commented that the "5 elements are clear and we welcome that they incorporate a strengths based model rather than a deficit model"

A local authority also commented that: "Definitions of the 5 key elements to be considered when conducting assessments provide a clear framework and a consistent approach across Wales"

ADSS Cymru and individual local authorities commented that the annex setting out the terms and definitions could be ". used as one of the tools for training and staff development"

Particular clarification was requested on the element relating to the strengths and capabilities. Mind Cymru, Welsh Enablement Alliance and the Welsh College of Occupational Therapists wanted re-ablement referenced within the strengths and capabilities element.

Children's Servicers sought clarity regarding the relationship between the 5

key elements of the Assessment and the 3 domains of enquiry used in the Framework for the Assessment of Children in Need.

Welsh Government Response

The code of practice will be refined to include further detail on the process of assessment and the application of the 5 elements of assessment.

The reference to personal resources in the codes is being replaced by a reference to Strengths and Capabilities – with an associated definition of this terminology. In addition, re-ablement will be referenced in the code on part 4: meeting needs. The code of practice will clarify how the simplified assessment and eligibility programme can both support access to a re-ablement programme and decisions at the completion of the reablement programme when a judgement is made as to whether the individual is likely to need ongoing care and support.

Through the Task and Finish group established as a result of the consultation, the Welsh Government will integrate the Framework for the Assessment of Children in Need and their Families into the Code of Practice for Assessing the Needs of Individuals..

Question 3:

	3. To what extent do you agree that the assessment model enables an integrated approach with other service providers providing support i.e. health, children and families, housing, mental health services?				
	Agree	Tend to agree	Tend to disagree	Disagree	Not ticked
Total -	2	44	17	9	24

Summary

The responses were very supportive of a more proportionate approach to assessment which is less bureaucratic and enables more flexibility in working with other service providers. However, the compartmentalisation of the assessment process into two categories (designated ‘simple’ and ‘complex’) was not seen to reflect the desired proportionality of approach.

There was clear support for the assessment model from the Welsh Local Government Association, and The Association of Directors of Social Services. Some responders indicated that there needs to be a change in culture to drive integrated practice.

The responses suggested that the codes of practice would benefit from further audit to ensure compatibility with proven and established approaches to assessment such as those undertaken through the Mental Health (Wales)

Measure 2010 and the Framework for the Assessment of Children in Need and their Families.

There was a call for statutory partners to work co-productively with each other, in particular Housing, Health and Education.

Carers Wales, in support of the view that the model will enable an integrated approach were clear that “potential solutions should not just be about what current services are available in any given area... practitioners should be encouraged to consider other solutions that may not be part of any one given service, so rather than fitting a person to an already existing service, a should be developed to fit around them.

Some local authorities suggested that a common template is used for the assessment process.

Some felt that common core data should relate directly to the UNCRC through the use of the 7 Core Aims framework.

Welsh Government Response

The responses will inform the development of the code of practice under part 9: Co-Operations and Partnership

However, on particular areas related to Parts 3 and 4 The Welsh Government has worked with representatives of the Mental Health sector to refine the Code of Practice to ensure compatibility of the assessment process with other key service providers and inform the ongoing review of the Mental Health (Wales) Measure 2010 with respect to the process of assessment. In addition, the regulations have been updated to offer further clarification about the process for undertaking specialist assessments.

Through the Task and Finish group established as a result of the consultation, the Welsh Government will amend the code of practice to reflect that the three domains from the Framework for the Assessment of Children in Need and their Families will be incorporated into the code of practice as the areas of enquiry, and that the 5 key elements will be used as the model for the analysis of that information.

The code of practice will be strengthened to provide a greater focus on the continuum of the assessment process. Local authority assessments will be proportionate to the need of the individual and the compartmentalisation of the assessment process into ‘simple’ and ‘complex’ will be removed in the light of consultation responses. Following further engagement with stakeholders, including representatives from both statutory and voluntary children’s services, it will be replaced with a simplified and consistent model of assessment.

A common template is being developed for application on an all Wales basis which will provide a consistent approach and greater continuity of care

between local authorities for service users. The use of the common template by each local authority will help with the portability of assessments.

The Code of Practice is only applicable to local authorities but the code of practice on part 3 requires local authorities to work closely with their partner agencies with respect to assessment and provides the framework for this to occur.

Question 4:

	4. To what extent do you agree that the eligibility test set out in regulations and the code of practice on Part 4 (meeting needs) supports consistent delivery across Wales to ensure a national threshold?				
	Agree	Tend to agree	Tend to disagree	Disagree	Not ticked
Total -	4	30	21	10	22

Summary

The responses tipped in favour of agreement that the model would ensure a national threshold. However the responses demonstrated a need for greater clarity and detail regarding the eligibility test.

Responders favoured a citizen centred approach to reflect the needs and circumstances of the individual. However concerns were expressed about how it would be applied consistently across Wales as it is open to interpretation and there are different services available in different parts of Wales.

There were comments from several groups about inconsistent and confusing terminology relating to personal well-being outcomes set out in the Act, the Regulations and the Code.

There was concern that individuals will only be eligible for care and support once they have exhausted all other measures and a lack of preventative services will push people to needing care and support plans.

Clarification is needed in relation to adults' personal resources, including their ability to manage their own well-being outcomes and whether informal support provided by the family or others is taken into account during the test.

Many respondents were concerned that the 'Can and Can Only Test' could be interpreted in different ways and further clarification was needed. This included concerns about how people would be empowered to challenge assessments based on professional judgements arguing that the emphasis should be on the local authority to evidence why a care and support plan is

not needed rather than the individual needing to evidence why one is.

The view was expressed in the consultation responses that references in the Regulations to people not being able to undertake daily living activities and self care should be enhanced by an understanding that people should be able to undertake such tasks without pain, distress, or anxiety and undertaking such tasks should not endanger the health of self or others, or take significantly longer than would be expected of someone who would not have needs that arise as set out in regulation 3.

Welsh Government Response

The Welsh Government will provide further clarity around the approach to eligibility by refining the regulations and codes of practice but we will not be proposing any fundamental changes to our approach.

We are confident that the eligibility test – the can and can only test - can be applied consistently to all people. However, rightly so, the response to each individual will be dependent on their circumstances and the services that are available to them. This reflects the citizen-centred approach set out in the Act.

The approach to determining eligibility is an outcome-based approach that relates closely to the National Outcomes Framework. The starting point is the meaning of “well-being” as set out in Part 2 of the Act and the local authority must determine whether the provision of care and support, or support in the case of a carer, will assist the person to meet their personal outcomes within that framework of well-being

This model of determining eligibility through assessment ensures a national eligibility framework that will be consistently applied across Wales. Although the pattern of service delivery will vary from authority to authority; what remains constant is the right to care and support from a local authority where that care and support is not otherwise available to the individual with needs which relate to the specified outcomes.

The codes on Part 3 Assessment and Part 4 Meeting Needs will be amended to clarify that individuals will **not** be required to have exhausted all other measures to be eligible for care and support. It is a function of the assessment process to identify whether and to what extent solutions other than care and support can safely enable people to meet their personal well-being outcomes.

The code of practice on assessment is being strengthened to require that in all cases the record of the Assessment must include an explanation of how the recommended action will help meet the identified outcome or otherwise meet needs identified by the assessment. This applies not only to those needs which are to be met through the provision of care and support but also those met through community based or preventative services, the provision of

Information, Advice and Assistance, or by any other means.

The code is being amended to clarify the consideration of support received from others as part of the determination of eligibility. The new approach will require assessments to recognise and record the contribution that carers make to what otherwise would be determined as eligible needs.

There were comments from several groups about inconsistent and confusing terminology when referring to outcomes set out in the Act, the regulations and the Code. This is being addressed through revision of the Regulations and the Codes to establish consistency in the use of the term 'personal well-being outcomes'. A regulation was added to set out that for the purposes of determining eligibility a person who is able to meet the need, alone or with the assistance of others is to be regarded as unable to meet the need if doing so—

- (a) causes significant pain, anxiety or distress to that person;
- (b) endangers or is likely to endanger the health or safety of that person or another person;
- (c) takes that person significantly longer than would normally be expected.

Question 5:

	5. To what extent do you agree that the roles of assessment coordinators and care coordinators should be reserved for specified practitioners?				
	Agree	Tend to agree	Tend to disagree	Disagree	Not ticked
Total -	21	27	8	3	28

Summary

There was support for reserving the role of co-ordinators although the comments from respondents emphasised the importance of assessors having the appropriate level of training rather than suggesting which roles should be reserved. There were calls for further guidance on the role of the co-ordinators and particular reference was made to the importance of the assessor being skilled in assessing the specific needs of the person being assessed. A key role for the co-ordinator was making sure these skills were available to the person whose needs are being assessed.

Local Authorities are widely supportive of the model but emphasise the need for staff training to enable consistent implementation of the new approach.

Groups representing people with sensory impairments and other disabilities counsel specific reference to recognising communication needs as a barrier

within the assessment process.

Welsh Government Response

The Welsh Government is committed to ensuring that professionals are properly trained and qualified to undertake appropriate roles. On the basis of the response to the question of reserving roles for specified practitioners we will pursue discussions with relevant professional groups to ensure an appropriate range of practitioners are engaged in and are able to undertake proportionate assessments. However this will not be dealt with through these regulations or form an immediate part of the codes of practice as the consultation responses will be used to inform the wider workforce strategy.

The regulations and Code of Practice will be strengthened to ensure that specialists are involved in assessments where necessary – either in a consultation capacity, or directly undertaking the assessment.

The code of practice will be revised to clarify the role of the co-ordinator required for these duties. Officials will subsequently discuss with the Care Council for Wales, as the lead body for workforce development, the training needs of staff undertaking this role.

The 2001 statutory guidance on *Social Care for deafblind children and adults* will be integrated into the codes of practice. This has been developed in close consultation with Sense Cymru.

Communication needs are identified within the regulations on eligibility as a need which may require the provision of care and support. Following the consultation the proposed approach to advocacy and a requirement for local authorities to involve specialists are both being strengthened to create mechanisms to ensure that people with communication needs are able to contribute as full partners to the assessment process

Question 6:

	6. To what extent do you agree that the regulations and codes of practice on Parts 3 and 4 provide a framework for meeting the needs of children?				
	Agree	Tend to agree	Tend to disagree	Disagree	Not ticked
Total -	6	28	9	1	43
Summary					

Respondents clearly agreed that the regulations and codes of practice provide a framework for meeting the needs of children but there was also strong support for replicating the current Framework for the Assessment of Children in Need and their Families in the Code of Practice.

The Children's Commissioner and Voluntary Organisations for Children called for detailed age-specific guidance in line with the Children Act 1989 and were concerned that the process of assessment and determination of eligibility is not appropriate for children without this detail. The Children's Commissioner called for separate regulations for children.

Respondents were not clear about the transition arrangements, from a child to an adult.

Welsh Government Response

The Act promotes a whole system approach with arrangements in place to meet the needs of all people. The Act reflects the duties in the Children Act 1989. It strengthens the legislative framework for children in Wales by setting out the process for the assessment of children in regulations for the first time.

As the Act is an all people Act, the intention is that there will be less of a demarcation of the transition from child to adult. Nevertheless the revised code on assessment will address the point raised about further clarification on transition and will state that transition from a child to an adult constitutes a significant change in circumstances and so create a right to a re-assessment of needs.

The Welsh Government accepts the call for the code of practice to be amended to reflect and integrate the Framework for the Assessment of Children in Need and their Families. To inform this work a small task and finish group has been formed and includes representatives from both the statutory and voluntary sectors along with regulators and Welsh Government officials. As a result of this work the code of practice on assessment will have a distinct section on considerations during the assessment of a child. This will include the integration of the key principles set out in the Framework and timeframes for the completion of an assessment.

The regulations are structured so as to address the variances required meeting the needs of children, adults and carers, within a consistent regulatory framework. The codes of practice are considered to be sufficiently broad to meet the needs of all people but will provide specific guidance with respect to children and young people where required.

Question 7:

	7. To what extent do you agree that the code and regulations on Part 4 will enable more people to have greater control over their care and support through direct payments?				
	Agree	Tend to agree	Tend to disagree	Disagree	Not ticked
Total -	11	39	5	3	29

Summary

Respondents welcomed the changes the legislation and code proposed in regards to the extension of direct payments. It was agreed that direct payments should be seen as an integral component in the broader framework of eligibility, assessment, and support planning and not viewed as a separate entity.

The duty to provide information, advice and support with the availability of advocates to help people make an informed decision was welcomed. It was recognised that there needed to be effective support services available to help people manage the services they procure and an advice hub, one stop shop where people could receive the same level of information and support was suggested to dispel variances in the quality of the delivery of information services.

Continuous training and workforce development to ensure practitioners are flexible creative and innovative and are content to push boundaries to enable the best outcomes for individuals is needed.

Respondents were concerned that appropriate and stringent safeguards were put in place to protect the most vulnerable, especially with the extension of direct payments to those who are drug and alcohol dependent. There was strong commitment for co-production and co-operatives to help recipients get the best outcomes.

Disappointment was aired over the Act failing to provide a legislative basis for direct payment in continuing health care. The Welsh Government has been urged to reconsider its position at the earliest opportunity to ensure Welsh citizens have parity with English direct payment recipients.

Welsh Government Response

The code on Part 4 strengthens the commitment of direct payments being an integral component of care planning and the code and the regulations together, place a duty on local authorities to provide information and support to make an informed choice. Conditions and safeguards have been built into the regulations and code to protect the vulnerable. These have been discussed with respect to question 8 below.

Training and communication are key aspects of the work that Welsh Government, working with partners, will be supporting over the transition

period and the Care Council for Wales, as the lead body for workforce development, has been commissioned to lead on the development and implementation of a national learning and development strategy. The strategy includes a training deployment plan and a one-stop-shop information hub.

Question 8:

	8. To what extent do you agree that the code and regulations on Part 4 support people to employ close relatives to manage or provide their care and support?				
	Agree	Tend to agree	Tend to disagree	Disagree	Not ticked
Total -	11	25	14	2	36

Summary

There was significant interest in the consultation question allowing direct payments to be used to employ relatives to manage or provide their care and support. There was slight concern that this policy option would pose implementation issues for local authorities especially around the safeguarding issues and wider concern of monitoring while remaining proportionate.

Appropriate safeguards and availability of independent advocates were deemed vital to ensure the individual's safety and to ensure that their wishes and feelings in decision making were upheld.

There was slight concern that this discretion would tip the balance of family bonds associated with caring. Local Authorities will need to discuss with the recipient the possibility of such arrangements changing family dynamics and to make clear to both the recipient and their relative the distinction between receiving a nominal amount for providing administrative support and management of the direct payment, and those relatives in the same household being paid for care.

Although welcomed by the majority of respondents it was felt that there needed to be clarity around management issues of an unregulated workforce. Respondents felt that family members would need to be assessed to ensure they had the appropriate skills to undertake the task but also assessed as a Carer who may be in need of support.

Some respondents requested greater clarity on how the Local Authority should decide whether employing a relative who lives in the same household is appropriate.

Respondents felt that the regulation relating to the employment of a relative

(regulation 6) as initially drafted did not satisfy the policy intention and would discourage relatives. The regulation was perceived as giving too much scope for local authority discretion and did not conform to the ethos of the Act of co-production, choice and control. Respondents called for the regulation to reaffirm the potential value of employing relatives and remove negative connotations.

Welsh Government Response

Conditions and safeguards have been built into the regulations and code which identifies that the local authority may authorise the use of direct payments to pay a relative if after taking into consideration the views of the recipient, it considers that it is necessary to promote their well-being.

The paragraph relating to direct payments as an employer (part 4 of code) will be amended to provide specific detail when considering the employment of a relative.

Reviews and monitoring provide a mechanism for regulating how relative carers are meeting their objectives. The requirements relating to monitoring and review are being strengthened in the code to identify how payments are being used to meet the person’s well-being outcomes.

Regulation 6 has been amended to clarify that the views of the recipient are a significant factor to be featured in the decision making process. We feel this strengthening of the regulatory power achieves the right balance in addressing the concerns received.

Question 9:

	9. To what extent do you agree that the Code issued for Part 3 and 4 supports local authorities to ensure people are full partners in the design and delivery of care and support?				
	Agree	Tend to agree	Tend to disagree	Disagree	Not ticked
Total -	8	37	10	4	28

Summary

There was strong agreement that the codes lay the foundations but on their own would not ensure people are full partners. Others agreed that the codes supported full partnership in principle but that this would only be truly apparent in practise. Training and workforce development featured as a critical ingredient in making this happen.

It was noted that the ‘5 key elements’ framework ensured that people are

central to all assessments, and the use of the 'what matters' principle to place the emphasis on personal outcomes as the prime focus of intervention is realised throughout the codes.

There was a suggestion that a wide media public campaign and awareness raising needed to help people understand the changes and the expectation of the Act.

Some respondent felt that there was not consistency across all sections of the codes and some regulations did not support full partnership – Regulation 6 of the Care and Support (Direct Payments) (Wales) regulations 2015 was cited as a contradiction.

Some health partners felt that the codes were more relevant to local authorities and would be difficult to apply if health partners were not on board. Code in Part 3 should be amended to say local authorities must work with their partner local health board.

Separate guidance was called for to support the codes in parts 2 and 3 of the Act, which should highlight the need to balance partnership working with the use of clear mandated powers when appropriate to safeguard children and young people and to ensure they can achieve their well being outcomes.

Welsh Government Response

The codes can only apply to local authorities, however the code on part 3 will be strengthened to reflect the need for partnership working.

The code on part 4 will be amended to provide more clarity and detail on the eligibility test.

Following the work of the Children's Framework Task and Finish group the codes of practice are being amended to emphasise the central duty to safeguard children and young people and to ensure they can achieve their well being outcomes.

Regulation 6 of the Care and Support (Direct Payments) (Wales) Regulations 2015 has been amended to be inclusive and ensure citizens are able to contribute as full partners to the design of the services they receive.

Training and communication are key aspects of the work that Welsh Government, working with partners, will be supporting over the transition period. At a local level authorities are responsible for informing citizens of their rights under the Act. Officials are not suggesting a programme of awareness-raising beyond the stakeholder engagement programme already announced and in effect.

Question 10:

Do you think that the proposals in this consultation will have any positive impacts on groups with protected characteristics? If so, which and why/why not?

Summary

Responders felt that the Act provides more autonomy over the care that individuals receive, particularly in relation to disabled individuals and those suffering with mental health.

Responders feel that there will be a positive impact with regard to disability and age as care and support will be co-produced.

There is a positive response to the Act promoting emphasis in line with 'Mwy na Geiriau' /'More than Just Words': The Strategic Framework for Welsh Language Services in Health, Social Services and Social Care

The responses highlighted evidence that that Gay / Lesbian / Transgender individuals sometimes face discrimination in accessing social support, which may be alleviated through the changes introduced in the proposed model.

Welsh Government Response

Welsh Government are pleased that more voice and greater control are recognised.

Question 11:

Do you think that the proposals in this consultation will have any negative impacts on groups with protected characteristics? If so, which and why/why not?

Summary

Respondents queried how the basic care needs of homeless individuals in Wales will be addressed through the regulations.

Many responders felt that the reference in the Act to the United Nations Convention on the Rights of Persons with Disabilities should be re-stated in the Code of Practice

Respondents also expressed the view that the code of practice should make reference to the Framework for Action on Independent Living.

There is a strong call for the 2001 statutory guidance on *Social Care for deafblind children and adults* to be included in the code of practice.

Welsh Government Response

Local authorities have a duty to provide for all people within their local authority, including homeless people. This may be delivered through a holistic approach working with the duties provided through the Housing Act.

The Framework for Action on Independent Living will be referenced in the code and in the code on Part 2 of the Act

The 2001 statutory guidance on Social Care for deafblind children and adults will be incorporated into the code.

Question 12:

Re-balancing the care and support system to deliver the new legal framework will require reprioritisation of resources. What are the key actions that need to be taken to achieve this?

Summary

There is a mix of responses on how local authorities should re-prioritise resources.

The priority from many responders is to reallocate resources to staff training and workforce development. These responses included non monetary resources such as access to learning resources, secondments and opportunity for co-location. Similarly it is made clear through many of the responses that resources should be reprioritised towards ensuring that organisational culture change is actively facilitated

Many responders were keen for the development of practice guidance to support local authorities in determining what ratio of investment between Information, Advice, and Assistance, preventative services, and a care and support plan.

There is a request for transition period for budgets and budget holders to consider the changes.

Welsh Government Response

Additional resources are being targeted at implementation. The delivering Transformation Grant will support Local Authorities and their partners over the next year in shifting practice etc. and the Social Care Workforce Development Programme Grant will be targeted at training for the implementation of the Act.

Question 13:

We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to tell us about them.

Summary

It is requested that all new requirements from the Act and its associated

statutory instruments are listed in one single document for ease of reference.

Some responders felt that some of the terminology is too vague and subject to wide variety of interpretation.

Welsh Government Response

Codes of practice for each part of the Act will be cross-referenced and will form a suite of codes for the application of the statutory requirements of the legislation and to support the delivery of the whole system change that the Act introduces.

Welsh Government Analysis

There was general support for the proposed system change to an outcomes-based approach with a simplified assessment and care planning process and the greater integration of services. In particular, there was clear support from our statutory partners. ADSS Cymru and WLGA commented that: “There needs to be absolute clarity about the future use of the eligibility framework to enable people to hold conversations about what will make a difference to their lives, rather than focus on whether they are eligible for care and support.”

This support reflects the extensive work undertaken through the technical groups and wider stakeholder engagement during the development of the regulations and codes of practice. As a result the approach taken was widely supported but the responses did outline some particular areas for further consideration.

To address the issues raised the Welsh Government has worked directly with representatives from the relevant organisations to further refine the regulations and codes of practice and address the particular issues raised during the consultation. This includes the following:

Assessment

The compartmentalisation of the assessment process into two categories (designated ‘simple’ and ‘complex’) was not seen to reflect the desired proportionality of approach. The guidance will be amended to reflect a more consistent approach to assessment whilst preserving the core principles and proportionality and co-production.

In addition a single National Assessment and Eligibility Tool will be developed to support implementation of the new model.

Children

Those who commented on the new model with respect to services for children were unambiguous for their support for the Framework for the Assessment of Children in Need and their Families commenting that it had “worked well” and it would be “disruptive to drop it, simply to harmonise an approach with adult services” (ADSS Cymru).

The Act introduces, for the first time, regulations about the assessment of the needs of children and the eligibility of those needs to be met by the local authority providing services or arranging for services to be provided. The codes of practice will be amended to reflect and integrate the Framework for the Assessment of Children in Need and their Families

Since the consultation ended a Task and Finish Group has been established with representatives from the Statutory, Voluntary and Regulatory sectors to advise on re-drafting the code. The key changes agreed with this group were:

- The code will emphasise that, for children, the process of assessment is about ensuring that the best interests of the child are met and children are safeguarded so that they reach or maintain a satisfactory level of health and development, or their health and development will not be significantly impaired.
- The code will incorporate the principles underpinning the Assessment Framework which provide for assessments which are child centred and embed the principle of the primacy of the welfare of the child.
- The assessment process for children will continue the requirement that practitioners gather evidence as informed by the three domains of the Assessment Framework and will then be analysed against the 5 elements of the assessment to inform, where necessary, the care and support plan.
- The code will be amended to reflect that working with family members is not an end in itself; the objective must always be to safeguard and promote the welfare of the child. Developing a working relationship with children and family members will not always be easy to achieve and can be difficult especially when there have been concerns about significant harm to the child. However resistant the family or difficult the circumstances, it remains important to continue to try to find ways of engaging the family in the assessment process.
- The Code of practice will require that refusal of assessments must be overridden where such a refusal would be inconsistent with the child's well-being
- The Code will expressly state that the transition from child to adult constitutes a significant change in circumstances.
- Where there is a request for services to be provided by the social services department. The response may include no action, or information or advice that would not result in direct action being taken/delivered by the local authority - that is itself a decision and should be made promptly and recorded. If the issues cannot be resolved and agreement reached through the provision of Information and Advice then the person progresses to assessment.

- Timescales for assessment are still being considered. The All Wales Heads of Children's services have agreed to move to a maximum of 42 days for an assessment of the needs of a child for care and support. The idea of 'long stop' dates for care and support planning for children is also advised.

The National Eligibility Framework

The responses supported the approach to eligibility but wanted greater clarity and detail about the application of the eligibility test.

The response from ADSS Cymru recognised the new approach to eligibility as a change "... away from eligibility criteria being used predominantly to gatekeep and "say no"". This response, along with many others noted that this test of eligibility "leaves space for professional judgment to be exercised" and commented that "the search for consistency may be difficult to achieve".

Analysis of the consultation responses showed that amongst local authorities there was a tendency to agree with the new approach to determining eligibility will ensure a national threshold and support consistent delivery. There was firm support for this new approach to eligibility from voluntary agencies, while partner agencies, including health bodies, tended to disagree.

The consultation responses did not lead the Welsh Government to reject the recommendation of the report of the Eligibility Technical Group (informed by the earlier report of the Social Services Improvement Agency: *Access to Care and Well-being in Wales 2013*) that this framework for eligibility has the potential to address the need to promote community and well-being services that are accessible and reduce inappropriate dependence on social services, whilst ensuring that those who are not able to manage their own care will have a right to care and support managed and delivered for them.

The comments did not lead the Welsh Government to consider that the proposed approach to the determination of eligibility would not be a sustainable option for the delivery of social care and support over the long term. The responses recognised the approach as one that "has the potential to support transformational social services in Wales" (Flintshire County Council) and called for clear guidance to practitioners to minimise inconsistencies in its application. The Code of Practice is being amended, through engagement with stakeholders, to provide more detail and clarity in the process of applying the determination of eligibility. This will include a National Assessment and Eligibility Tool.

There was concern that individuals may be required to 'prove' that they need a care and support plan by 'trying out' inappropriate community services before establishing their eligibility. To re-inforce professional accountability the code will be amended to require that where, through the assessment, a local authority decides that a need will not be met by a care and support plan there will be a requirement for that local authority to identify in the record of assessment how they consider the proposed action will help someone achieve their personal well-being outcomes. This will give citizens a statement on which to base any disagreement on how best they can be supported to meet their identified personal well-being outcomes.

As a result of the comments received the Welsh Government intends to commission an evaluation to enable the impact of the new national model of eligibility to be considered.

Carers

Carers' groups emphasise the importance of responsive support to meet carers fluctuating abilities to meet the needs of those they care for and are concerned that there will be a tendency to assume that carers can meet the needs of those they care for.

Regulations have been re-drafted and the code of practice is being amended to clarify the consideration of support received from others as part of the determination of eligibility. The new approach will require assessments to recognise and record the contribution that carers make to what otherwise would be determined as eligible needs. The statutory instruments also recognise that carers may be both unable and unwilling to provide care. There should be no automatic assumption that carers will meet needs.

Advocacy

A stronger reference to advocacy is being embedded within the assessment process. This is being addressed through amendments to the codes of practice on assessment and detailed guidance on advocacy in the code of practice on Part 10 which is being prepared for the second tranche of consultations.

Terminology

In places the use of language and terminology was challenged as reinforcing old legislation, ethos and culture. In response to comments from Disability Groups the codes will contain more overt reference to the social model of disability and making specific reference to Transforming Social Services: Towards an Enabling Wales Toolkit.

Sensory Impairment

The Welsh Government has worked with Sense Cymru on the key requirements from the 2001 guidance, which was re-issued in 2014, that will be incorporated into the codes of practice issued under the Social Services and Well-being (Wales) Act 2014.

Communication

Groups representing people with sensory impairments and other disabilities counsel specific reference to recognising communication needs as a barrier within the assessment process. This has been reflected both in the codes and in an amendment to the eligibility regulations.

The responses flagged some potential changes to regulations and also outlined some areas of broader concern. These have been addressed through re-drafting of the codes of practice and amendments to regulations.

There was consensus from respondents that cultural change would not happen without public awareness and robust integrated communication strategies to ensure individuals are aware of the overarching empowerment agenda. This would need to be aligned to a robust workforce development plan across the health, social care and community sectors in order to deliver a remodelled and consistent framework.

Direct Payments

Respondents welcomed the changes the legislation and code proposed in regards to the extension of direct payments. Direct payments are seen as an integral component in the broader framework of eligibility, assessment, and support planning and not viewed as a separate entity.

The changes relating to the employment of close relatives were welcomed as supporting continuity of care and recognition of service user's personal choice. Some concern was identified that regulations still provided too much scope for local authority discretion.

Reviews and monitoring provide a mechanism for regulating how relative carers are meeting their objectives. The requirements relating to monitoring and review are being strengthened in the code. These will provide appropriate safeguards to ensure the individual's safety and that their wishes and feelings in decision making are upheld.

Regulation 6 of the code on Direct payments has been amended to clarify present that the views of the recipient are a significant factor to be featured in the decision making process. We feel this strengthening of the regulatory power achieves the right balance in addressing the concerns received.

Workforce

Local Authorities are widely supportive of the model but emphasise the need for staff training to enable consistent implementation of the new approach. There was consensus from respondents that cultural change would not happen without public awareness and integrated communication strategies to ensure individuals are aware of the overarching empowerment agenda. This would need to be aligned to a robust workforce development plan across the health, social care and community sectors in order to deliver a remodelled and consistent framework.

The Care Council for Wales, as the lead body for workforce development, has been commissioned to lead on the development and implementation of a national learning and development strategy. The strategy is critical to the implementation of the Act and will need sustained, deliberate and high-profile leadership, which can reach out across a wide range of organisations and partners beyond the boundaries of the traditional social care sector. The Care Council has developed this work with key stakeholders to ensure we have a strategy which covers all of those involved in the provision of social care, together with their key partners, and that it is delivered jointly and in collaboration with those partners.

There was strong support for reserving the role of a co-ordinator and a very strong view from voluntary agencies that the assessor must be appropriately skilled to understand the particular needs of the person being assessed. This was most strongly emphasised with respect to communication skills. These points have been addressed through amendments to both regulations and codes, and issues around reserving roles will be subject to future action.

The Welsh Government will continue to work with the national partnership forum, the leadership group and citizens panel to support this change, and ensure that people who use services remain at the heart of our programme for change.

Additionally, officials will continue to monitor the impact of the regulation on areas such as Welsh language, the UN rights of the child and Older People and Equality.

Annex A - List of respondents

No	Confidential Y / N		Name	Organisation/On behalf of
1.	✓			
2.		✓	Fiona Wilke	Individual
3.		✓	Ms Maxine Norrish	Cardiff University RTP student
4.		✓	Gillian Cooper	Cardiff University
5.	✓			
6.		✓	Laura Tuckley	Individual
7.		✓	Charlotte Beare-on behalf of the Hywel Dda Health Board by Dr Phil Kloer	Hywel Dda Health Board
8.		✓	Cheryl Bulman	Individual
9.		✓	Dr Aideen Naughton	Public Health Wales
10.		✓	Ruth Northway	Learning disability advisory group
11.		✓	Zoë Williams	Direct Payments Overview Group
12.		✓	Zoë Williams	All Wales Direct Payments Forum
13.		✓	Beth Evans	Carers Wales
14.	✓			
15.		✓	Gareth Cooke	Torfaen Social Care and Housing
16.		✓	Lynne Doyle -	Neath Port Talbot CBC
17.		✓	Mike Mainwaring	Neath Port Talbot Council for Voluntary Service
18.		✓	Dr Catrin Mair Edwards	SeNSE Cymru
19.		✓	Vin West-	Arfon Access Group
20.		✓	Eve Parkinson -	Welsh Therapy Advisory Committee
21.		✓	Colin Hopwood	Individual
22.		✓	Simon Legg	Spinal Injuries Association
23.		✓	Rachel Williams	Parkinson's UK Cymru
24.	✓			
25.		✓	Ann Acock	Welsh Physiotherapy Leaders Advisory Group
26.	✓			
27.		✓	n/a (Nigel champ - e- mail)	the Chair of the Welsh Medical Committee
28.		✓	Joe Powell	All Wales People First
29.		✓	Hannah Isaacson	Powys Association of Voluntary Organisations
30.		✓	Peter Jones	Guide Dogs Cymru and Blind Children UK Cymru
31.		✓	Natasha Wynne	Marie Curie
32.		✓	Cecile Gwilym	NSPCC Cymru
33.		✓	Peter Martin	Hafal
34.		✓	Meleri Thomas	National Autistic Society Cymru
35.		✓	Tess Saunders,	RNIB CYMRU

36.		✓	Laura Cook	Alzheimer's Society
37.		✓	Liz Majer	Blaenau Gwent County Borough Council
38.		✓	DEBBIE POWELL	SOCIAL CARE IN PARTNERSHIP – SOUTH EAST (SCiPse)
39.		✓	Edwin Jones	LDAG Subgroup - Transforming Care in Wales for people with learning disabilities and challenging behaviour
40.		✓	James Crowe	Learning Disability Wales
41.		✓	Lynne Hughes	MS Society Cymru
42.		✓	Paul Swann / Rick Wilson	Disability Wales / Wales Alliance for Citizen Directed Support Provider Network
43.		✓	Kelly Ball	Newport People First
44.		✓	Alex Perry	Newport People First (trustee)
45.		✓	Allan	Member of Newport People First
46.		✓	Zarah Kaleem	Trustee of Newport People First
47.		✓	Deborah Driffield	City & County of Swansea Social Services
48.		✓	Lola Richards	Cyngor Sir Ynys Mon
49.		✓	No Name	Cyngor Sir Ynys Mon
50.		✓	Jacqueline Davies	CYPP
51.		✓	Ruth Crowder	College of Occupational Therapists
52.		✓	Kieron Rees	Carers Trust Wales
53.		✓	Ruth Crowder	Welsh Reablement Alliance
54.		✓	Ann James	Care Council for Wales
55.		✓	Robin Moulster	BASW Cymru
56.		✓	Ruth Coombs	Mind Cymru
57.	✓			
58.		✓	Hywel Ap Dafydd	Children's Commissioner for Wales
59.		✓	Dr Sam Clutton	Barnardos Cymru
60.	✓			
61.		✓	Caroline Hawkings	Scope Cymru
62.		✓	Judith Brooks	Bridgend County Borough Council
63.		✓	Catherine Manning	British Red Cross
64.		✓	Philippa Ford	CSP
65.		✓	Holly Towell	Headway
66.		✓	Bethan Jones Edwards	North Wales Social Services Improvement Collaborative
67.		✓	Alice Southern	Alzheimer's Society
68.		✓	Dusty Kennedy	Youth Justice Board
69.		✓	Ian Thomas	Citizens Advice Cymru
70.		✓	Nicola Evans	Older People's Commissioner for Wales
71.		✓	Jenny Williams	Conwy County Borough Council
72.		✓	Catherine Poulter	Carmarthenshire County Council
73.		✓	Ele Hicks	Diverse Cymru
74.		✓	Erin Rodgers	The Disabilities Trust
75.		✓	Giovanni Isingrini	ADSS Cymru

76.		✓	Sue O'Grady	Powys CC
77.		✓	Paul Apreada	FNF Both Parents Matter Cymru
78.		✓	Suzanne Griffiths	National Adoption Service
79.		✓	Catherine Lewis	North Wales Disabled Children Social Services Mangers Network
80.	✓			
81.		✓	Dominic Carter	UK Homecare Association
82.		✓	Catherine Lewis	North Wales Disabled Children Social Services Mangers Network
83.		✓	Sian Walker, Tony Young	Cardiff Council
84.	✓			
85.		✓	Martyn Palfreman	Mid and West Wales Health and Social Care Collaborative
86.		✓	Rosanne Palmer	Age Cymru
87.		✓	Gill Paul	Gwynedd Council
88.		✓	Michael Nicholson	Newport County Council
89.		✓	Mair Kromei	Hywel Dda Health Board
90.		✓	Iola Richards	Cyngor Sir Ynys Môn
91.		✓	Judith Brooks	Bridgend County Borough Council
92.		✓	Phil Evans	Vale of Glamorgan
93.		✓	Owen Williams	Wales Council of the Blind
94.		✓	Judith Hall	CSSIW - National Advisory Board
95.		✓	Sara Harvey	Western Bay Programme
96.		✓		Voices from Care Cymru
97.		✓	Roger Bishop	All Wales Children and Young Persons Advocacy Providers Group
98.		✓	Katie Dalton	Gofal
99.		✓	Marshall Phillips	Wales Sub -Committee of Association of HM District Judges
100		✓	Bobby Bolt	Aneurin Bevan University Health Board
101		✓	Catrin Edwards	Sense Cymru
102		✓		Carers Wales
103		✓	Anselm Benedict	Law Society