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Llywodraeth Cymru  
Welsh Government

Welsh Government  
Consultation Document – Summary of responses

## **Code of practice in relation to measuring social services performance**

Date of issue: February 2020

Code of practice in relation to the performance and improvement of social services in Wales

<b>Audience</b>	Local Authorities, Third Sector organisations, Social Care Wales, Care Inspectorate Wales, ADSS (Cymru), WLGA and other stakeholders
<b>Overview</b>	Summary of consultation responses on the Code of practice in relation to the performance and improvement of social services in Wales
<b>Action Required</b>	None – for information only
<b>Further Information</b>	<p>Further enquiries should be directed to :</p> <p>Well-Being &amp; Improvement Branch  Health &amp; Social Services Group  4<sup>th</sup> Floor North  Welsh Government  Cathays Park  Cardiff  CF10 3NQ</p> <p><a href="mailto:SocialServicesImprovement@gov.wales">SocialServicesImprovement@gov.wales</a></p> <p><a href="mailto:GwellaGwasanaethauCymdeithasol@gov.wales">GwellaGwasanaethauCymdeithasol@gov.wales</a></p>
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<b>Related Documents</b>	<p>Consultation on measuring social services performance  <a href="https://gov.wales/measuring-social-services-performance-code-practice">https://gov.wales/measuring-social-services-performance-code-practice</a></p> <p>Social Services &amp; Well-Being (Wales) Act 2014  <a href="https://www.legislation.gov.uk/anaw/2014/4/contents">https://www.legislation.gov.uk/anaw/2014/4/contents</a></p> <p>Existing Code of practice on measuring social services performance  <a href="https://gov.wales/measuring-social-services-performance-code-practice-0">https://gov.wales/measuring-social-services-performance-code-practice-0</a></p> <p>Social services National Outcomes Framework  <a href="https://gov.wales/social-services-national-outcomes-framework">https://gov.wales/social-services-national-outcomes-framework</a></p>

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## Background

The Social Services and Well-being (Wales) Act 2014 ('the Act') came into force in April 2016. The Act provides the legal framework for improving the well-being of people who need care and support, and carers who need support, and for transforming social services in Wales. The Act builds on The White Paper Sustainable Social Services for Wales: A Framework for Action that was published in 2011.

The Welsh Government is responsible for monitoring the impact of the Act on people who need care and support and carers who need support. In order to achieve this, a range of outcome indicators and performance measures have been put in place. These include:

- The National Outcomes Framework<sup>1</sup>
- The Performance Measurement Framework for Local Authorities<sup>2</sup>
- The Local Authority Activity Data
- Personal Well-being Outcomes

The current Performance Measurement Framework for Local Authorities was published in 2016 as a Code of Practice<sup>3</sup>. This framework focuses on three key areas – quality standards, qualitative measures and quantitative measures – and requires local authorities to gather data in relation to these areas.

Feedback from local authorities and other partners regarding the quality of the submitted data has demonstrated that the current model for the framework is not working as intended and requires refining. This feedback has been consistent across the sector and includes issues such as:

- the current performance measures provide activity data rather than measuring performance
- the measures do not accurately reflect the range of support that local authorities are delivering in relation to the Act
- the measures do not stretch the local authorities or provide them with a framework which supports their improvement
- the qualitative element of the framework – the Citizen Survey – is not of a high enough quality and has generated a low response rate

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<sup>1</sup> <https://gov.wales/topics/health/socialcare/well-being/?lang=en>

<sup>2</sup> <https://gov.wales/topics/health/socialcare/well-being/performance/?lang=en>

<sup>3</sup> <https://gov.wales/docs/dhss/publications/160401codeen.pdf>

- the quality standards do not set a strong enough vision for social care in Wales

To address these issues, a range of workshops were held with local authorities and other key stakeholders.

Through the workshops, it was suggested that a wider and more comprehensive Performance and Improvement Framework should be developed and should be linked to the Well-being of Future Generations (Wales) Act 2015 as well as the Social Services and Well-being (Wales) Act 2014.

### **The new approach**

The new approach has been developed to focus on performance **and** improvement equally. It includes the development of new Quality Standards alongside a new Performance and Improvement Framework.

The Welsh Government undertook consultation on the new Quality Standards and the new Performance and Improvement Framework. This document summarises the key themes from the responses received to that consultation.

### **The consultation process**

The consultation went live on 13<sup>th</sup> May 2019 and ran for 12 weeks closing on 5<sup>th</sup> August 2019. To support the consultation a number of consultation events were run across Wales aimed primarily at local authorities and the third sector.

### **Responses**

The consultation received a total of 43 responses from local authorities, third sector organisations and individuals. Four respondents wished to remain anonymous. Of those that agreed to be named, 20 local authorities provided a response. A full list of those who responded can be found at Annex A.

## Questions and emerging themes

<b>Q1</b>	<b>To what extent do you agree that the Code of Practice (set out in Annex A) will support local authorities to measure performance and inform improvement in relation to the social services functions placed upon them under the Act?</b>			
	Strongly Agree	Agree	Disagree	Strongly Disagree
Totals	1	24	5	1
Percentages (of those who responded)	3%	78%	16%	3%

Of the 43 responses received, 31 responded to this question leaving 12 non-responses.

The majority of respondents (81%) either strongly agreed or agreed that the Code of Practice will support local authorities to measure performance and inform improvement in relation to social services functions placed upon them under the Act.

Of those that agreed, many welcomed the inclusion of qualitative and research and evidence parts of the revised code of practice and said it represents a welcome shift in the way that local authorities assess their services. Many commented on the clear structure and welcomed the fact that due to the removal of the performance indicators in legislation it would allow for more flexibility with the performance data requirements. Finally, many agreed that there has been a good level of engagement up until this point in the process however, it was noted that this level of engagement needed to continue.

Many felt that it was difficult to know whether the Code of Practice would inform improvement as they only had access to information regarding the metrics. They felt that in order to make an informed decision on the Code of Practice and the framework more information should be provided on the qualitative and research and evidence component. There were also concerns that by launching the metric element before the other two components it would send a message to the sector that quantitative, output-based measures are more important than outcomes and experiences of people who use care and support.

Many questioned whether the metrics would be useful at a national level due to the differences in service delivery models and were unsure what Welsh Government would be doing with the data.

In terms of the Code of Practice, there were comments regarding its remit. Some commented that the functions under the Act goes beyond local authorities and that it should be recognised within the Code of Practice and Quality Standards. There were also comments surrounding Children and Young People and highlighted the fact that service delivery and accountability should be easily understood by children.

Respondents suggested that the Code of Practice should be reference and align with other pieces of legislation and frameworks such as:

- Regulation and Inspection of Social Care (Wales) Act 2015<sup>4</sup>
- Health and Social Care (quality and Engagement) (Wales) Bill<sup>5</sup>
- National Outcomes Framework for Social Services<sup>6</sup>
- Abolition of Defence of Reasonable Punishment (Wales) Bill<sup>7</sup>
- Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015<sup>8</sup>.
- More than Just Words<sup>9</sup>

There were overwhelming concerns about resources. Many commented on the fact that they would not have the staff resource or skills in order to apply the new Code of Practice and framework.

### **Welsh Government response:**

Based on the feedback from the consultation Welsh Government are confident that the Code of Practice will support local authorities to measure performance and inform improvement. Minor changes will be made to the Code in line with the comments in the consultation to ensure that the language is clear and the Code can be used practically to inform improvement.

Although the remit of this Code of Practice specifically looks at the local authorities' social services functions under the Social Services and Well-being (Wales) Act 2014, work will continue to consider how Welsh Government can continue to support the whole sector to improve.

Welsh Government acknowledge that the level of engagement with the sector has been well received and will work to continue to engage throughout the development, implementation and delivery of the framework.

Welsh Government recognise the importance of aligning the Code to other pieces of legislation and frameworks. Welsh Government will ensure that it is made clear how the Code aligns to other legislation in subsequent guidance that is produced to complement this Code.

Welsh Government welcomes the feedback received regarding children and the recommendation that more should be done to ensure they understand the purpose of this Code. To ensure that children can more easily understand accountability and delivery of services we will produce an easy read version of the Code and

<sup>4</sup> Regulation and Inspection of Social Care (Wales) Act 2016 retrieved from <http://www.legislation.gov.uk/anaw/2016/2/contents/enacted> on 21/08/19

<sup>5</sup> Health and Social Care (quality and Engagement) (Wales) Bill retrieved from <http://senedd.assembly.wales/mgIssueHistoryHome.aspx?Ild=25475> on 21/08/19

<sup>6</sup> National Outcomes Framework for Social Services retrieved from <https://gov.wales/social-services-national-outcomes-framework> on 21/08/19

<sup>7</sup> Abolition of Defence of Reasonable Punishment (Wales) Bill retrieved from <https://gov.wales/children-abolition-defence-reasonable-punishment-wales-bill> on 21/08/19

<sup>8</sup> Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 retrieved from <https://www.legislation.gov.uk/anaw/2015/3/contents> on 21/08/19

<sup>9</sup> More than Just Words retrieved from <https://gwedhill.gov.wales/topics/health/publications/health/guidance/words/?lang=en> on 21/08/19

consider what more we can do to support children understanding the framework in the development of subsequent documents and guidance.

Q2	<b>To what extent do you agree that the Quality Standards (as set out in the Code of Practice) enable local authorities to measure performance and inform improvement in relation to the social services functions placed upon them under the Act?</b>			
	Strongly Agree	Agree	Disagree	Strongly Disagree
Totals	1	21	8	1
Percentages (of those who responded)	3%	68%	26%	3%

Of the 43 responses received, 31 responded to this question leaving 12 non-responses.

The majority of respondents (71%) either strongly agreed or agreed that the Quality Standards will support local authorities to measure performance and inform improvement in relation to social services functions placed upon them under the Act.

Of those that agreed they supported the fact that they were aspirational and not too prescriptive in nature, which would allow space for local authorities to deploy new and innovative approaches. Many felt that because of this they would act as a lever to support improvement within local authorities. Many welcomed the fact that there is a clear link between national outcomes, and the principles set within the Social Services and Well-being (Wales) Act 2014. Many also welcomed the fact that there was an explicit link between Care Inspectorate Wales' inspection framework and the well-being goals and felt that there was value in aligning key strategic frameworks, which would also support the development of the Director's Report. However, there were some concerns that the Quality Standards were open to interpretation and may be seen as optional.

Some respondents suggested that the Quality Standards should be explicitly linked to 'A Healthier Wales'<sup>10</sup>, 'Well-being of Future Generations (Wales) Act 2015'<sup>11</sup> and 'The Right Way: A future for Children'<sup>12</sup>,

There were references to the resource implications surrounding the implementation of the Quality Standards. Many felt that there should be more

<sup>10</sup> 'A Healthier Wales' retrieved from <https://gov.wales/healthier-wales-long-term-plan-health-and-social-care> on 21/08/19

<sup>11</sup> 'Well-being of Future Generations (Wales) Act 2015' retrieved from <https://gov.wales/well-being-future-generations-wales-act-2015-guidance> on 21/08/19

<sup>12</sup> 'The Right Way: A future fit for children' retrieved from <https://www.childcomwales.org.uk/resources/childrens-rights-approach/future-fit-children/> on 21/08/19



support and guidance for local authorities. There were also references to the fact that the Quality Standards are also just focussed on local authority functions rather than the sector as a whole. Many thought that the Code of Practice, including the Quality Standards should be broader than just local authorities,

Many responses commented on the language used within the Quality Standards and felt that there would be benefits to amending the wording to ensure it is more strength based and specifically reworded to state ‘children who are looked after’ rather than ‘looked after children’. Similarly, some suggested that more needs to be added regarding the role of children’s services, for example child protection.

Finally, a number of comments highlighted the fact that there was overlap between the Quality Standards and were concerned that there was not an explicit link between the Quality Standards and the data (quantitative and qualitative). Some felt that this might cause confusion and frustration when it comes to reporting.

**Welsh Government response:**

Based on the feedback from the consultation Welsh Government are confident that the Quality Standards will enable local authorities to measure performance and improvement in relation to the social services functions placed upon them under the Act. Minor changes have been made to the Quality Standards to ensure that the language is consistent and terminology is correct.

Welsh Government will carefully consider feedback regarding reporting and the difficulty local authorities may encounter due to there not being an explicit link between the metrics and the quality standards. However, the metrics have not been explicitly mapped to the Quality Standards deliberately as the metrics may provide supporting evidence for multiple quality standards and the aim is to have this flexibility within the framework. Guidance will be provided alongside the Director’s Report to support local authorities with reporting against each of the Quality Standards.

Q3	<b>To what extent do you agree that the Performance and Improvement Framework (as set out in the Code of Practice) enables local authorities to measure performance and inform improvement in relation to the social services functions placed upon them under the Act?</b>			
	Strongly Agree	Agree	Disagree	Strongly Disagree
Totals	1	22	4	3
Percentages (of those who responded)	3%	73%	14%	10

Of the 43 responses we received, 30 responded to this question leaving 13 non-responses.

The majority of respondents (76%) either strongly agreed or agreed that the Performance and Improvement Framework will support local authorities to measure performance and inform improvement in relation to social services functions placed upon them under the Act.

Of those that agreed, there was support for the fact that the three components of the framework would be equally weighted. Many thought that the new approach would allow for more of a focus on citizen voice to be heard. The focus on improvement in the new framework was also welcomed. Suggestions were made for the Performance and Improvement Framework to be linked to other key documents such as the Population Needs Assessments, Well-being Assessments, Joint Area plans and the Directors of Social Services Annual Report.

However, many felt that the definitions in the framework were too high level and required some changes to the terminology. Many felt that there was also a need for guidance and resources to support the elements of the framework.

For the quantitative element, there was concern about the number of metrics being proposed and the fact that some local authorities may not have the IT infrastructure and systems to be able to capture the information required.

It was noted in some instances that the current citizen survey was not fit for purpose, and the new approach to the survey was welcomed. However, there was some concern about the lack of clarity and detail in the qualitative and the research and evidence components of the framework. Some suggested recommendations for the qualitative approach stating that it should not just include a survey but should also include focus groups as well as semi-structured interviews. There were also suggestions for the research and evidence component that there should be better co-ordination and utilisation of the existing evidence that is already out there and accessible to the sector.

**Welsh Government response:**

Based on the feedback from the consultation Welsh Government are confident that the Performance and Improvement Framework will enable local authorities to measure performance and inform improvement in relation to the social services functions placed upon them under the Act.

Amendments have been made to the framework in line with feedback from the consultation. Specifically around the definitions within the framework. Many felt that they were too high level and required changes to terminology. The three original components, quantitative, qualitative and research and evidence, have been changed to '*measuring activity and performance*', '*understanding experience and outcomes*' and '*using evidence to inform improvement*'. The rationale for this is that this demonstrates the aims of the framework rather than the methods that could be used to meet those aims.

Welsh Government will be providing detailed guidance on the framework to support local authorities with implementation.

Welsh Government recognise the importance of aligning the Code to other key documents. We will ensure we make it clear how the Code aligns to other legislation in subsequent guidance that is produced to complement this Code.

Q4	<b>To what extent do you agree that the metrics within the Technical Guidance demonstrate the full range of activities that local authorities are required to deliver in relation to the social services functions placed upon them under the Act?</b>			
	Strongly Agree	Agree	Disagree	Strongly Disagree
Totals	0	15	12	2
Percentages (of those who responded)	0%	52%	41%	7%

Of the 43 responses we received, 29 responded to this question leaving 14 non-responses.

Just over half of respondents (52%) either strongly agreed or agreed the metrics within the Technical Guidance demonstrate the full range of activities that local authorities are required to deliver in relation to the social services functions placed upon them under the Act.

Of those that agreed many felt that the proposed metrics were comprehensive and covered the majority of activities carried out by local authorities. Many also welcomed the fact that it was split into the four areas adults, children, carers and workforce.

Many highlighted that although comprehensive there were still a number of gaps in the data including:

- Individual and service outcomes
- Progress of social enterprises
- Transformation and innovation
- Creative practice
- Positive risk approach
- Progression
- Preventative services
- Collaborative working
- Occupational therapy
- Mental Health provision for adults and children
- Transition between children and adults services
- Delayed Transfers of Care
- Carers who are disabled
- Direct payments
- Care workers employed outside of local authority (Domiciliary Care/ Third Sector).
- Contracts advertised but not let

- Social Care staff training
- Personal outcomes
- Commissioning
- Integrated Autism Services
- Advocacy and advocacy type
- Deafness and hearing loss

There was some concern that the metrics focussed on processes rather than outcomes and there was limited information on the impact of services. There were also significant concerns raised over the number of metrics currently being proposed. Many thought that there were too many and that it would be difficult to extract information from their current systems. There were also significant concerns that collection of this data goes against the ethos of the Act and increases the burden on frontline staff as they will be pulled away from their social work duties into inputting data into their systems. Some suggested that it may be beneficial to have smaller number of more focussed metrics or to phase the introduction of the metrics.

Questions were raised regarding what the data would be used for by Welsh Government.

#### **Welsh Government response:**

Based on the feedback from the consultation Welsh Government recognised that this was the highest area of concern for local authorities, with only 52 per cent agreeing that the proposed metrics demonstrate the full range of activity that local authorities are required to deliver under the Act.

Based on the feedback from the consultation Welsh Government has undertaken a significant amount of additional work to further develop the metrics.

An in depth analysis was undertaken of the feedback from the consultation to further explore those metrics that were causing the most concern. This analysis was shared widely with local authorities, Social Care Wales, ADSS Cymru, Care Inspectorate Wales and other key stakeholders to seek their views and to determine whether a metric should be refined or deleted. Following this exercise, the final number of metrics has been reduced by approximately 40 percent. This responds directly to the feedback raised in the consultation and ensures that final list of metrics has been informed by the social care sector.

The next steps will include the drafting of clear, collectively agreed definitions and guidance in order to support the collection of the metrics. This will be developed collaboratively with local authority representatives via the National Reporting Sub Group<sup>13</sup>.

Welsh Government acknowledges that there remain some gaps within the framework and that a number of these were highlighted within the consultation.

<sup>13</sup> Every local authority in Wales is a member of the National Reporting Sub Group.

The flexibility of removing the metrics from the Code of Practice into separate guidance means that changes and amendments can be made to the metrics in the future if there is a sound rationale for doing so and the systems are in place to collect the new data. There may also be an opportunity to address some of these gaps in the ‘understanding experience and outcomes’ component of the framework or address them through undertaking specific research projects if the systems are not in place to collect the data. This will be determined as the framework becomes embedded.

The consultation raised issues including, local authorities not having the systems in place to collect the data, not knowing specifically how to measure certain metrics, increased burden on local authorities and the lack of resources and skills to implement the framework. Welsh Government has undertaken a detailed risk analysis to gather further information on these issues and will continue to support local authorities, based on this analysis, with the implementation of the framework.

Within the consultation questions were raised regarding the data Welsh Government collects and what the data is used for. The data collected from local authorities is regularly used to inform policy and legislation development. It also provides assurance to Ministers and provides a national picture of social services provision in Wales. More specifically, Care Inspectorate Wales are also routinely using the data to inform individual and thematic performance review activity. Finally, when published, it is used by a wide range of stakeholders, including third sector organisations and researchers, and all data is also fully accessible to the public via Stats Wales. Welsh Government recognises that further work is needed in this area to help local authorities to understand how the data is used and will develop a detailed Communications Plan to support this.

<b>Q5</b>	<b>Considering the metrics that are set out in the Technical Guidance, do you have any specific comments in relation to the metrics that are being proposed? Please include the metric reference in your response.</b>
<p><b>Summary</b></p> <p>Of the total number of responses received, 51.16% commented directly on the metrics that were contained in the accompanying draft guidance.</p> <p>Comments were received on all 4 themes (adults, children, carers, workforce) and were split amongst these as follows:</p> <ul style="list-style-type: none"> <li>43% - Adult services</li> <li>21% - Children’s Services</li> <li>28% - Carers</li> <li>8% - Workforce</li> </ul>	

Comments were analysed for clustering to determine which areas gathered the most comments:

### **Adult Services:**

For adults the areas where there were most comments were surrounding Information, Advice and Assistance (IAA), Service Provision, Safeguarding, (Deprivation of Liberty Safeguards - DoLS) and Delayed Transfer of Care (DTC). Comments primarily focussed on the availability and suitability of the data for collection and analysis within the current electronic social care systems utilised to record case information for social services departments. Many local authorities did not currently collect data for some of the metrics or collected it in a way that made extraction and analysis of data difficult (where data was collected via unstructured methods, e.g. in free text narrative). This has meant that local authorities have anticipated in their consultation responses that some significant changes will be needed to their processes and systems. We also received several comments that focused on the availability of data elsewhere (e.g. DTC) and the policy changes that will affect DoLS. The most significant clustering for adult metrics was around IAA. It was apparent from the comments that there was still some confusion on the requirements of IAA and what data should be recorded as a part of this process.

### **Children's Services**

For children the areas where clustering of comments was apparent were - IAA, Assessments (including re-assessments), Advocacy and Care leaver metrics. These comments mainly focused on whether the data was currently available for collection and analysis from the existing electronic social care systems, as well as concerns about the quality of the data available. Overall, the number of comments received for children's metrics was far fewer than those for adult services. Many of the proposed metrics were already collected locally and, for those metrics that received the most comments, many just sought to better understand the requirements of collection. There was some commonality between adults and children. This was most apparent in IAA, where the comments portrayed the same issues that were described for adult metrics.

### **Carers**

Comments on carers were generally concerned with the availability of data and the inability of local authorities to collect the data requested without significant system development. Another area that was highlighted was the inability to collect data from third parties or commissioned services that provided support to carers. Some local authorities stated that carers will often get redirected to support outside of the local authority at the IAA stage and that further information past this stage was not always available to them.

### **Workforce**

As with carers. There was general concern about the availability of data and the requirement for system changes. Some local authorities stated that their current Human Resources systems were unable to collect this data.

### **Further comments**

A broad range of comments were received on many of the proposed metrics. They ranged from simple requests for clarification or minor changes of language, to challenges as to the validity of the inclusion of a particular metric. Some metrics gathered no comments and were seen to be valid and without issue. Other metrics were seen as an issue or presenting a particular problem i.e. they would need significant system development in order to be collected.

The detailed analysis of comments suggests that the greatest concerns in all demographic groups were for the metrics related to IAA. Service provision for adults also gathered a large number of comments, mainly on the differences in service models delivered at a local level, which was said to be a risk, particularly regarding consistency and compatibility of data.

The lack of a nationally described data model was of particular concern to some local authorities. Local authorities use locally defined forms and processes tailored towards their own models of practice. Even when the same system is used (WCCIS, for example), there are differences between authorities in how data is recorded and managed.

The ability to resource the changes needed to alter forms, systems and processes was also of concern. Many of the new metrics called for data that was currently recorded as unstructured data in the case recordings on the system. Some of the changes required were seen by some local authorities to be significant and the lack of time, skills and financial resources were seen to be a potential threat to the delivery of the new framework.

Finally, the size of the quantitative element of the new framework was also called into question. Many respondents felt that there were too many metrics and that these focused too much on administrative processes rather than success or outcomes. It was pointed out by some local authorities that whilst our aim was to create better equity between different methods of assessing performance, the quantitative data requirements had increased.

#### **Welsh Government response:**

The Welsh Government's Quantitative Writing Group was tasked with undertaking a rationalisation exercise to remove metrics that were collected elsewhere or where alternative methods of collection would offer better insight and understanding. Other metrics have been modified so that the rationale for collection is clear, or has been simplified to allow for easier interpretation and understanding of the requirements. These decisions were made based on the feedback from the consultation.

Welsh Government has also committed to undertake further investigative work on areas where data collection is problematic or further research is required. This work, in the first instance, will include further analysis of the IAA provision across Wales which is being led by SCIE. Part of this research will focus on if any metrics can be collected in relation to this specific policy area or whether, going forward, impact will have to be measured through a more qualitative approach. The

qualitative and research elements of the framework will be developed further and delivered in phase two of implementation.

Whilst we will reduce the overall number of metrics for delivery in phase one, Welsh Government acknowledges the importance of the continued collection of quantitative data as a key component of its data strategy in the improvement of social services in Wales. Developing a new data strategy for social care data is a priority for Welsh Government in light of improvements to systems, the increase in the amount of data available and the availability of technology that can allow for better understanding of the data held by local authorities in Wales.

The removal of metrics in phase one of the framework is due to a combination of many factors, but absent from these is any notion that collection of information on certain topics is less important. Indeed, as systems become more aligned and improvements in technology allow for more advanced analysis of data, further metrics and performance monitoring can be introduced to the framework. Any changes will be made in collaboration with the local authorities and other key stakeholders and will be signed off by the Executive Group that is tasked with overseeing this project.

In addition to the work in rationalising the metrics for delivery in phase one, a number of respondents to the consultation sought further information on aspects of social care delivery that aligned with their areas of work. All of these suggestions will be carefully considered by Welsh Government for inclusion into the framework at a later date. The inherent flexibility of the framework to accept new data items is one of its strengths. The appetite for high quality data for use in improving social services has increased exponentially over recent years. Welsh Government is committed to being able to support these needs now and into the future.

For phase one delivery, the metrics have been changed as follows:

For Adults:

Metrics Retained	16	
Metrics Modified	14	
Metrics Deleted	15	
Metrics Added	3	
Total number of final metrics		33
% Reduction	33.33%	

For Children

Metrics Retained	38	
Metrics Modified	11	
Metrics Deleted	7	
Metrics Added	6	
Total number of Final Metrics		55
% Reduction	10.91%	

For Carers:

Metrics Retained	6	
Metrics Modified	12	



Metrics Deleted 28  
 Metrics Added 0  
 Total number of Final Metrics 18  
 % Reduction 60.87%

**For Workforce:**

A decision was made for the workforce metrics to be removed completely from the Performance and Improvement Framework and the responsibility for the collection of all workforce data will pass to Social Care Wales. The reason behind this change was in line with our strategy for collecting the right information at the right time in the right place.

Social Care Wales have workforce development within their remit. They are already collecting data on the social care workforce outside of local authorities using the Social Care Workforce Development Programme (SCDWP). It makes sense to group the collection of data on the social care workforce into a single collection, allowing for a more efficient and effective process. Work on developing this programme in collaboration with stakeholders will continue in phase two of the project.

<p><b>Q6</b></p>	<p><b>The qualitative component of the Performance and Improvement Framework is still under development.</b></p> <p><b>Thinking specifically about Qualitative Data, what, in your view, should be included in this component so that we are able to understand and improve people’s experiences of care and support and carer’s experiences of support?</b></p>
<p>Many highlighted the need for the current citizen survey to be revised. There were a number of comments suggesting that the current survey is a burden for local authorities and is not providing useful information and in some instances was causing distress for those being asked to complete the survey.</p> <p>There were comments to suggest that the qualitative element should not just include a survey but should include a mix of data collection methods. Many highlighted that there is a lot of work going on already with regards to qualitative approaches including the collection of stories and using most significant change approaches as well as local authorities having their own local surveys that are used to understand services. Many suggested it would be beneficial to work regionally and for the new approach to be developed and co-produced with service users and other stakeholders.</p> <p>Overall, most felt that having an independent national social care survey would be beneficial. Not only would this remove the burden from local authorities but it would also allow for more consistent application of the survey but also allow for more robust methods and findings.</p>	

Many commented that the new approach should include not just those who receive care and support but those who touch social services in some way. There were also comments surrounding accessibility of the new survey with many suggesting that it needs to be accessible to all, specifically young people and those who have a disability.

There were some suggestions in terms of content. Some felt that the survey should include data on the workforce, Welsh language and the third sector. There was also reference to well-being outcomes and the fact that the new survey should include measures of well-being.

**Welsh Government response:**

Welsh Government welcomes the views on the qualitative data that should be included into the new Performance and Improvement Framework. Welsh Government has agreed to commission a National Social Care Survey to remove the majority of burden that is placed on the local authorities. This will be carried out by an independent organisation, starting in 2020-21, and will form phase two of the Performance and Improvement Framework which will be launched in April 2021.

The consultation also highlights the need to consider a mix of qualitative data collection methods. Welsh Government welcomes these views and has developed a qualitative writing group to advise on the direction of this work and to also to support in the development of advice, guidance and quality assure the work that is being undertaken. The qualitative data will build on the quantitative metrics and will further explore the impact, outcomes and quality of experience of people who are in need of care and support and carers who are in need of support.

Information regarding the qualitative component of the framework will be brought to the Business Intelligence Group for advice, guidance and challenge and will then be agreed and signed off by the Executive Group. This will ensure that, as with the quantitative metrics, the qualitative data is developed in partnership with local authorities and other key stakeholders. The qualitative component of the framework will be implemented as part of the phase launch in April 2021.

<p><b>Q7</b></p>	<p><b>The Research and Evidence component of the Performance and Improvement Framework is still under development.</b></p> <p><b>Thinking specifically about Research and Evidence, what, in your view, should be included in this component so that we are able to understand and improve people’s experiences of care and support and carer’s experiences of support?</b></p>
<p>Many highlighted the need for more detailed information on the research and evidence component before being able to comment on this element of the framework. For those that did provide comments there was a clear need for</p>	

training to be developed for local authorities. Many felt that guidance, courses and/or e learning would be beneficial.

There were also concerns around resource and the fact that local authorities would not have the capacity or finance to fulfil this element of the framework.

Many highlighted the need for the sharing of research and the need for a social care research network in Wales where research could be shared. Not only would this increase learning but it would also avoid duplication of research. Linked to this there were also comments to suggest that a social care research library or repository that is accessible to local authorities would be beneficial.

Many suggested a greater need to link with local universities, the School for Health and Care Research Wales, the Research and Innovation Hubs and the third sector. It was also recognised the need for this element of the framework to link with the Social Care Research and Development Strategy 2018-23.

Many highlighted the need for further or more accessible research in certain areas such as:

- Welsh Language
- Commissioning
- Referrals
- References to UN Conventions

Although it was recognised that clearly, defined research questions need to be developed before commissioning research.

#### **Welsh Government response:**

Welsh Government welcomes the views on the Research and Evidence component of the Performance and Improvement Framework.

Throughout the consultation many highlighted that 'research' is only one component of evidence and therefore the use of this word caused confusion. In line with this feedback, Welsh Government has amended the name of this component to, *Using Evidence to Inform Improvement*. This demonstrates the aims of the framework rather than the methods that can be used to meet those aims.

Within the consultation many highlighted the need for further information, training and resources to support them with this component. To address this Welsh Government has commissioned the Wales School for Social Care Research to develop resources which will include:

- agreed definitions of research, evidence, data and evaluation;
- how to use data and evidence effectively;
- how to undertake effective research;
- understanding evaluation techniques; and
- Undertaking effective peer reviews.

These will be developed specifically to support local authorities in relation to the delivery of the Performance and Improvement Framework and will be published bilingually online on the Welsh Government website ready for the launch of the new framework in April 2020.

Welsh Government are also working closely with Social Care Wales and the Wales School for Social Care Research to undertake research looking into what more can be done to support local authorities to understand and use evidence within practice. This will consider specifics such as, what practice is out there that is currently working well, what is meant by capacity and what training would local authorities find useful.

This will inform the development of a Social Care Research and Development Strategy, ready for phase two of the Performance and Improvement Framework in April 2021. Careful consideration will be given to ensure this aligns with already established strategies within Wales.

Information regarding the '*Using Evidence for Improvement*' component will be brought to the Business Intelligence Group for scrutiny and then be agreed and signed off by the Executive Group

Q8	<b>To what extent do agree that the Children Receiving Care and Support Census, the Looked After Children Census, the Adults Safeguarding return and the Staff of local authority departments return are fit for purpose and should be included as they are into the new Performance and Improvement Framework?</b>			
	Strongly Agree	Agree	Disagree	Strongly Disagree
Totals	1	14	3	1
Percentages (of those who responded)	5%	74%	16%	5%

Of the 43 responses we received, 29 responded to this question leaving 14 non-responses.

The majority of respondents (79%) either strongly agreed or agreed that the Children Receiving Care and Support Census, the Looked After Children Census, the Adults Safeguarding return and the Staff of local authority departments return are fit for purpose and should be included as they are into the new Performance and Improvement Framework.

The majority of respondents felt that they were useful at a local and national level and provide a good view of current service activity in Wales. There was also support to keep these collections due to their long standing nature and the ability to monitor activity over time. However, there were some comments around the Children

Receiving Care and Support Census and the Adult Safeguarding return. Respondents highlighted the fact that they were time consuming to complete and may not be valuable at a national level due to variation and definitions. There was also one comment regarding the timing of data submission, and stated that most social care data submission dates are in May which has resource implications for local authorities.

Some comments suggested some additional data to be added to the Census' such as breakdowns of disability.

Finally, there were comments regarding Welsh Government's requirements for the data and questions surrounding what Welsh Government do with the data submitted. There was a call for Welsh Government to provide more feedback to local authorities and also to publish the data in a more timely manner.

**Welsh Government response:**

The response to the consultation indicated that the Children Receiving Care and Support Census, the Looked After Children Census, the Adult's Safeguarding return and the Staff of Local Authority Departments were all fit for purpose. The Children Receiving Care and Support Census, the Looked After Children Census, the Adult's Safeguarding return will be collected by Welsh Government with a revised workforce return to be collected by Social Care Wales.

Welsh Government and the Knowledge and Analytical Services within Welsh Government will consider the timeliness of submission dates and the publication of data.

Q9	To what extent do you agree that Welsh Government should develop an annual census for Adults Receiving Care and Support?			
	Strongly Agree	Agree	Disagree	Strongly Disagree
Totals	3	17	5	1
Percentages (of those who responded)	12%	65%	19%	4%

Of the 43 responses we received, 26 responded to this question leaving 17 non-responses.

The majority of respondents (77%) either strongly agreed or agreed that Welsh Government should develop an annual census for Adults Receiving Care and Support.

Of those that agreed many thought that it would provide useful information on service provision and could be used for planning purposes. However, comments suggested that an Adults Census would be substantially bigger than the Children's Census and therefore there would be concerns of the resources required to

complete an Adults Census. Some suggested that if this was to go ahead this should be introduced once the framework and metrics were in place.

There were also a number of comments surrounding disability and how this would fit with the new census. Although useful, many commented on the difficulties in collecting disability data and wanted any proposals to streamline the disability data that is already provided.

Comments were submitted around what exactly would be included in the adult's census. Respondents wanted more information before making a decision and some thought that any proposals for a census should be co-produced.

Of those that disagreed, some disputed the value of an adult's census and suggested that the proposed metrics were already comprehensive and would cover the majority of information on adults already.

**Welsh Government response:**

Overall, there was support for the development of an adults receiving care and support census. To limit the burden on local authorities the census will be developed, in collaboration with local authorities, in phase two of the framework, alongside the qualitative and evidence components of the framework. It is intended that this new census will be launched in April 2021.

<b>Q10</b>	<b>What, if any, additional support does Welsh Government need to put in place to support local authorities to implement the new Code of Practice and the Performance and Improvement Framework?</b>
<p>Respondents suggested a range of additional support that Welsh Government need to put in place in order to implement the new framework. These include:</p> <ul style="list-style-type: none"><li>- Clear guidance that includes comprehensive terminology, definitions and a clear description of 'what good looks like'. This would allow for metrics to be less open to interpretation</li><li>- Guidance on methods for calculation of the metrics to ensure consistency</li><li>- Reduced number of metrics</li><li>- More detail on the qualitative components and the research and evidence components which demonstrates clearly what is expected of local authorities</li><li>- Staggered data collection and submission timetable</li><li>- Additional time to implement the new framework, as there are concerns that systems will not be ready for April 2020.</li></ul>	

- Additional resources within local authorities. Including financial resources, staff and training to support the collection and analysis of the data.
- Support to extract data from all systems. There were some concerns that local authorities would not be able to extract the data from WCCIS and would need support to develop new reports
- Clear rationale from Welsh Government on what the data submitted will be used for.
- Better engagement across all levels to ensure consistency provide the ability to best practice.
- Better co-ordination between health and social care at all levels.

**Welsh Government response:**

Welsh Government acknowledges the changes and impact that this will have on local authorities and recognises the need to support local authorities in implementing the new Code. Welsh Government commits to the following in order to support the development, implementation and use of the Performance and Improvement Framework:

- Reduced number of metrics based on the feedback from the consultation
- Full guidance and definitions relating to the metrics that will be developed by the National Reporting Sub-Group
- Review of the data collection timetable and publication of results
- Removal of citizen survey from local authorities with a view to commission a National Social Care Survey from an external provider.
- Additional support and guidance on the 'understanding experience and outcomes' component which will be developed by the Qualitative Writing Group.
- Further collaboration on the 'using evidence for improvement' component
- Initial research resources to be published by April 2020
- Develop an implementation plan for the Performance and Improvement Framework
- Clear communication from Welsh Government during implementation and through delivery.
- Continuation of the Business Intelligence Group to ensure key messages are shared to the sector and ensure that all local authorities remain included in these discussions.
- Commitment to provide regular updates to ADSS Cymru through the Executive Group

<b>Q11</b>	<b>What metrics should be developed to measure the impact and effectiveness of integration and ways of integrated working?</b>
<p>Many comments reflected the fact that integrated metrics should not just fall to the local authorities to provide. Some comments suggested working with Regional Partnership Boards and suggested they should lead on the reporting of this. Many recognised the difficulty in developing joint metrics and suggested that if any were to be developed then we should look at what is collected across health and social care in the first instance to explore if any suitable metrics are already being collected. Any new metrics should be developed collaboratively and there should be a clear agreed vision across health and social care about what integrated working should look like – one respondent suggested using ‘Stepping up to the place: integration self-assessment tool’<sup>14</sup> to help to support this process.</p> <p>Many commented that the effectiveness of integration and integrated working cannot solely be measured through metrics and should be considered in a number of ways such as case studies, peer reviews and qualitative approaches focussed on the experiences of people who receive a number of services.</p> <p>For those that did suggest joint metrics they included:</p> <ul style="list-style-type: none"> <li>- Assessment waiting times in CAMHS</li> <li>- Access to CAHMS</li> <li>- Staffing costs</li> <li>- Number of cases seen by a multi-professional team</li> <li>- Attendance at multi-agency meetings</li> <li>- Procurement arrangements</li> <li>- Commissioning</li> <li>- Care workers career pathway</li> <li>- School exclusions for those receiving care and support</li> </ul>	
<p><b>Welsh Government response:</b></p> <p>Local authorities are all at different levels of integration and have taken different approaches to how they organise and integrate their services. Welsh Government recognises that this may provide a challenge in terms of developing integrated metrics that are applicable across all local authorities. There may also be issues around determining who is responsible for the data when integrated metrics are being considered and this needs to be agreed early in the process to avoid potential difficulties.</p> <p>Welsh Government will continue to engage with Regional Partnership Boards and others to see how to best approach the collection of integrated metrics and evidence, which will form phase two of the framework. Welsh Government will also consider whether further research needs to be undertaken in this area to understand the approaches to and impact of integrated working.</p>	

<sup>14</sup> Stepping up to the place: integration self-assessment tool - <https://www.local.gov.uk/stepping-place-integration-self-assessment-tool> - accessed on 21/08/10



Q12a	<b>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?</b>
Q12b	<b>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?</b>
<p>The majority of respondents did not comment on this question. For those that did respond they felt that the proposals in this consultation would have a positive impact on groups with protected characteristics as it will allow for a better understanding of individuals with protected characteristics who are approaching local authorities for advice and/or assistance as well as those who receive care and support.</p> <p>The majority felt that there would be no negative impacts on groups with protected characteristics. However some suggested that a review of the Equality Impact Assessment would be beneficial.</p>	
<p><b>Welsh Government response:</b></p> <p>Welsh Government has noted comments made in the consultation and is satisfied that the Performance and Improvement Framework will not impact negatively on groups with protected characteristics. To ensure that this is the case the Equality Impact Assessment will be reviewed, as required by law, to ensure that this is the case and the impact on groups with protected characteristics is considered in further detail.</p>	

Q13	<p><b>Please explain how you believe the proposed policy could be formulated or changed so as to have:</b></p> <p><b>a) positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and</b></p> <p><b>b) No adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.</b></p>
<p>The majority of respondents did not comment of this question. For those that did respond they felt that the proposals would have a positive impact on Welsh language as it would allow local and national understanding on how the provision of Welsh language is being used and would ensure that there was a consistent approach to using and treating Welsh language on an equal basis.</p>	

A number of respondents felt that the proposed metrics on Welsh language could be improved in order to gather to ensure there is compliance with section 14(1) of the Social Service and Well-being (Wales) Act 2014.

**Welsh Government response:**

Welsh Government has noted the comments made in the consultation and is satisfied that the Performance and Improvement Framework will have no negative impacts on the Welsh Language. To ensure that this is the case the Welsh Language Impact Assessment will be reviewed.

**Annex A – List of responses**

Reference	Confidential	Respondent	Organisation
001	Yes		
002	Yes		
003	Yes		
004	No	Jane Davies	Flintshire County Council
005	No	Eli Crouch-Puzey	Welsh Women's Aid
006	No	David Harding	NPT County Council
007	No	Julie Boothroyd	Monmouthshire Council
008	No	Dyfan Barr Michael Jones	Denbighshire Council
009	No	Samuel Stone	National Autistic Society
010	No	James Langridge	Powys County Council
011	No	Elizabeth Flowers (on behalf of Sally Holland)	Children's Commissioner for Wales
012	No	Kerry O'Donovan	Merthyr Tydfil CBC
013	No	Jill Griffiths Simon Jones John Grenfell	Swansea Council
014	No	Peter Tyson	Bridgend CBC
015	No	Vicky Poole	Care Inspectorate Wales
016	No	Claire Lucignoli	Parent/Carer
017	No	Cerys Jones	North Wales Community Health Council
018	No	Aled Roberts	Welsh Language Commissioner
019	No	Alyson Jenkins	Blaenau Gwent CBC
020	No	Valerie Bilingham	Age Cymru
021	No	Morwenna Edwards	Gwynedd Council

022	No	Claire Marchant L Carver	Cardiff Council Vale of Glamorgan Council
023	No	Beth Evans	Carers Wales
024	No	Tracy Amos	Pembrokeshire County Council
025	No	Catherine Franklin Donna Schofield	Torfaen CBC
026	No	Joel Martin	Carmarthenshire County Council
027	No	Anne Elgin	Royal Voluntary Service
028	No	Beth Phillips	Social Care Wales
029	No	Unison	Unison
030	No	Joe Powell	All Wales People First
031	No	Nicola Free	Rhondda Cynon Taff
032	No	Joanne Griffin	Welsh Therapies Advisory Committee
033	No	Carol Walker	Conwy CBC
034	No	Dai Davies	Royal College of Occupational Therapies
035	No	Stewart Blythe	ADSSC WLGA Data Cymru
036	No	Adrian Bailey	Swansea SCVS
037	No	Not Provided	Newport Council
038	No	Melanie Minty	Care Forum Wales
039	No	Joff Lee	Ceredigion County Council
040	No	Nicola Evans	Older People's Commissioner Wales
041	No	Not Provided	National Deaf Children's Society Cymru
042	Yes		
043	No	John Dyer	WCCIS

