

Number: WG40732



Llywodraeth Cymru  
Welsh Government

Welsh Government

Consultation – summary of response

## Reducing Restrictive Practices Framework

A framework to promote measures and practice that will lead to the reduction of restrictive practices in childcare, education, health and social care settings

June 2021

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.  
This document is also available in Welsh.

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<p>Overview</p>	<p>This document provides a summary of the responses related to the Welsh Government’s approach to promoting measures and practice that will lead to the reduction of restrictive practices.</p> <p>The consultation introduced the updated guidance - Reducing Restrictive Practices Framework and sought view on a framework to promote measures and practice that will lead to the reduction of restrictive practices in childcare, education, health and social care settings.</p> <p>The intention of the updated framework is to promote measures and practice that will lead to the reduction of restrictive practices. The framework also seeks to ensure that where restrictive practices are used this is informed by person centred planning, within the context of the service setting and in a way which safeguards the individual, those whom they interact with, and those who provide services to them.</p>
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<p>Further information</p>	<p>Easy read, alternate language, large print and Braille versions of this document are available on request</p>
<p>Related documents</p>	<p><a href="https://gov.wales/guidance-reducing-restrictive-practices-childcare-education-health-and-social-care-settings">https://gov.wales/guidance-reducing-restrictive-practices-childcare-education-health-and-social-care-settings</a></p>

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## 1. Introduction

### Reducing Restrictive Practices Framework

The Welsh Government is introducing a Framework to promote measures and practice that will lead to the reduction of restrictive practices. The framework also seeks to ensure that where restrictive practices are used this is informed by person centred planning, within the context of the service setting and in a way which safeguards the individual, those whom they interact with, and those who provide services to them.

The Welsh Government is clear that the use of restrictive practices and restraint should be within the context of the [European Convention on Human Rights](#) and in line with the principles described in the *Human Rights Framework on Restraint* produced by the [Equality and Human Rights Commission](#).

The approach set out in the Framework and seeks to promote the rights and principles set out in the [United Nations Convention on the Rights of the Child](#) (UNCRC); [United Nations Principles for Older Persons](#) and the [United Nations Convention on the Rights of Persons with Disabilities](#).

In order to achieve the aims of this framework, organisations should have a threefold focus:

- Preventing the necessity for restrictive practice through the development of reduction strategies and through the promotion of a human rights approach, for example, positive behaviour support (PBS).
- Working with individuals towards reducing the level of response where a potential need for restrictive practice is identified as part of the person centred planning and practice process.
- Where situations requiring restrictive practice are identified as unavoidable, ensuring that there is prior planning and training to ensure safety for all concerned.

The Welsh Government considers that the guidance it issues on restrictive practices should ensure that those who work with children and adults in childcare, health, education and social care settings share a common framework of principles and expectations informed by an approach that actively promotes human rights.

The intention of this Framework is to inform commissioners of services and service providers, who should refer to the framework when drafting policies and procedures, reviewing current arrangements and arranging or commissioning training. The Framework does **not** advise on individual actions required in specific circumstances or specific service settings, nor does it recommend specific methods of restraint.

This Framework is non-statutory however; it sets out the Welsh Government's expectations for policy and practice in reducing restrictive practices across childcare, education, health and social care settings as part of a person centred approach. As such the Inspectorates: Estyn; Health Inspectorate Wales and Care Inspectorate Wales will consider compliance with the approach set out in the Framework when they carry out inspections.

The purpose of the consultation was to introduce the updated guidance – Reducing Restrictive Practices Framework (the Framework) and sought views on the Framework that promotes measures and practice that will lead to the reduction of restrictive practices in childcare, education, health and social care settings.

The updated guidance replaces the [Framework for Restrictive Physical Intervention Policy and Practice, Welsh Assembly Government \(2005\)](#).

The Framework was subject to a 12 weeks consultation period from 7 October 2019 to 6 January 2020. The Consultation was published on the Welsh Government's website. An email was distributed to a wide range of stakeholders notifying them of the consultation and inviting them to respond.

The consultation asked nine questions relevant to the Framework. An easy read and a children and young people's version was also produced, asking the same set of questions.

The publication of this summary of responses has been delayed as a result of the Covid-19 pandemic.

## **2. Pre-consultation engagement and Framework development**

The Framework was drafted by Sarah Leitch (BILD) and Dr Anne MacDonald( The Richmond Fellowship Scotland), on behalf of BILD (British Institute of Learning Disabilities), who were commissioned by the Welsh Government to develop the Framework, working to an Advisory Group.

The Advisory Group included internal membership from across relevant Welsh Government policy areas and representatives of:

- Care Inspectorate Wales;
- Estyn;
- Healthcare Inspectorate Wales;
- Learning Disability Learning Disability Ministerial Advisory Group;
- NHS Wales;
- Public Health Wales;
- Social Care Wales;

A pre-consultation draft was shared for early comment with:

- Children's Commissioning Consortium Cymru (4Cs);
- The Fostering Network Cymru;
- Equality and Human Rights Commission;
- Learning Disability Wales;
- Mind Cymru;
- Office of the Children's Commissioner for Wales;
- Office of the Older People's Commissioner for Wales;
- Safeguarding Education Group.

## **3. Response to consultation questions**

In total there were 83 responses received to the consultation, primarily from commissioners of services, service providers and those who work with children and adults in childcare, health, education and social care settings. Of the 83, 32 did not use the template provided, but submitted word documents. All comments received have been considered equally.

This report forms a summary of all the responses received through the consultation and identifies proposed action to address the issues raised. A list of respondents is attached at Annex A.

Overall, there was broad support for the principles behind the Framework, which will lead to the reduction of restrictive practices in childcare, education, health and social care settings. Many welcomed the opportunity to update the Framework, stating that it was a positive step and approach to care, with the approach supporting the Social Service and Wellbeing (Wales) Act 2014, through improving the wellbeing of people who need care and support.

### Question 1:

<b>Are the aims and purpose of the Framework as set out in the Introduction clear and easy to understand?</b>				
Total 83	Yes 73	No 0	Unsure 7	No response 3
<p><b>Summary-</b> Overall, the majority of respondents were positive in their comments in response to Question 1. 91.25% of those who responded said that the intent and aspirations of the Framework are clear and well set out and in line with the ethos and intention of legislation in Wales.</p> <p>The majority agreed that the introduction sets out the purpose of the Framework including relevant policies and legislation, highlighting the Framework’s aims to reduce restrictive practices. It also provides the rights of the individuals and the safety and protection of those who look after them, as well as what process there is to review and check on practices.</p> <p>The Children’s Commissioner for Wales’s response said that: <i>“I hope that this new Framework will help to ensure that commissioners are as proactive as possible in ensuring those working with children and young people in childcare, education, health and social settings are provided with the training and guidance they require to effectively reduce their use of restrictive practices”</i>.</p> <p>The All Wales Challenging Behaviour Community Practice responded that: <i>“This Welsh Reducing Restrictive Practices Framework is regarded by CBCoP members and other experts (including experts by experience) as one of the most appropriate, comprehensive, coherent and progressive policy statements to date. We believe this could put the Welsh Government and Welsh citizens in the lead of international good practice”</i>.</p> <p>It was agreed that in cases where restrictive practices would be required, the Framework ensures they would be carried out in a ‘person-centred’ way in line with the Human Rights Act (1998) working in this way would safeguard the individual and staff involved.</p>				

Some respondents raised concerns about the need for the Framework to be more detailed and sector specific for example:

The NASUWT felt that: *“the Framework does not give sufficient emphasis to the critical importance of this issue or how it is best addressed in the context of challenging pupil behaviour. They also had concerns that a ‘one size fits all’ approach would result in confusion, with negative welfare implications for both learners and workers. Any advice and guidance for schools and alternative providers on restraint would need to reflect these contextual distinctions”*.

Cwm Taf Morgannwg University Health Board commented that whilst they welcomed the Framework and that it was extremely positive and highlights the value and importance placed on the subject matter, they felt that the Framework was quite broad and would have welcomed specific guidance for service groups, but acknowledged that this isn't that straightforward.

Some respondents commented that the Framework was weighted towards Children's Services; however, others, including Social Care Wales raised concerns about a focus on adults rather than adults and children and young people.

Whilst agreeing with the Framework proposal, suggestions were made by more than one organisation that the Framework should be placed on a statutory footing to place a legal duty on organisations to ensure it is implemented and upheld as in its current form, the framework will be viewed simply as best-practice guidance by often overstretched services. Whilst they welcome the roles that inspectorates will play in assessing the impact of the Framework, they remain concerned that as a non-statutory Framework, the guidance set-out will be viewed by organisations as a should rather than a must in terms of setting and implementing policy.

There were some comments about the complexity of language and terminology used in the Framework.

## **Welsh Government Response**

It is reassuring to see that a significant proportion of the respondents who addressed this question agreed that the Framework would offer positive guidance to reduce reliance of restrictive practices and therefore make a real difference in the lives of people who may be subject to them.

The Advisory Group who informed the development of the Framework considered in detail the option of producing a statutory Framework, rather than a non-statutory Framework as proposed and of the inclusion of more sector specific guidance.

This would be challenging to achieve in a timely way, across sectors, not least because of the range of relevant legislation and regulation. However, the principle rationale for the decision to produce a non-statutory Framework was agreement that there is a need to achieve a change of culture across sectors, supported by sector level policies and workforce development. It was felt that on balance the best approach was to set expectations and encourage ownership at the sector level. However, we will ask Ministers to agree to a commitment to review the impact of implementation after 3 years.

The Welsh Government has also noted the comment made as to language and terminology used in the Framework. This will be addressed as part of the ongoing work, which will include updating the Framework to reflect the comments received and ensure that the Framework is clear and comprehensible.

A recommendation was made that there is an opportunity in the introduction to strengthen advice on why restrictive practices should be reduced in Wales and we will consider how this can be achieved in the final Framework.

## Question 2:

### **Does Chapter 1 set out information on a human rights framework for the reduction of restrictive practices in a way that is clear and useful?**

Total 83	Yes 72	No 1	Unsure 6	No response 4
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**Summary-** 91% of those who responded to this question were in agreement that Chapter 1 does set out information on a human rights framework for the reduction of restrictive practices in a way that is clear and useful and also highlights what actions organisations should take to ensure the reduction of restrictive practices.

The Children’s Commissioner for Wales, response said that: *“This Framework is an important document in ensuring that, in Wales, we take all appropriate measures possible to prevent violence and cruelty against children and young people. I am pleased to see that the United Nations Convention on the Rights of the Child (UNCRC) is included within the ‘purpose of framework’ section,”* However, while children’s human rights under the UNCRC are referenced in Appendix 1, the Children’s Commissioner for Wales would have liked to have seen them included in the human rights framework section of this document and would also like to see included the principles of the UNCRC directly referenced.

MIND Cymru welcomed that the fact that the Framework refers to the United nations Convention on the Rights of the Child (UNCRC) and the United Nations Convention the rights of Persons with Disabilities (UNCRPD) but had concern that neither were referenced within Chapter 1.

Estyn welcomes the guidance, stating that *“it has the potential, with prior strategic planning and ensuring that specialist trained staff are in place, to ensure all tiers and stakeholders work together to learn and constantly develop their practice. It will also support and dovetail into the principles of the ALN Bill”.*

There were some specific comments for amendments made on Chapter 1. These included calls for the glossary and description of measures to support behaviour to be strengthened.

One responses received didn't agree that the chapter is clear and useful and commented that the wording that organisations 'should' is weak. A suggestion was made that the imperative is strengthened somewhat e.g. '*Effective organisations ensure there is a clear policy in place to help staff understand their responsibilities in the context of this framework.*'

It was also suggested that there is a need to monitor and reflect on the policy's implementation to ensure that policies are consistent and effective and determine whether employees are complying, especially important in the childcare, early years and play sector. The suggestion was that these measures be set out in the Framework.

### **Welsh Government Response**

The Welsh Government has noted the comments made about language and terminology and we will review the Framework to ensure it is clear and comprehensible. We also consider how to better incorporate reference to the United Nations Convention on the Rights of the Child (UNCRC) and the United Nations Convention the rights of Persons with Disabilities (UNCRPD) into the main body of the Framework.

### **Question 3:**

#### **Does Chapter 2 provide information about Positive Behaviour Support (PBS) in a clear and useful way?**

Total 83	Yes 62	No 5	Unsure 10	No response 6
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**Summary-** Of those who responded to this question, the majority or 81% agreed that Chapter 2 provides information about Positive Behaviour Support (PBS) in a clear and useful way.

There were comments that the focus on preventative work is clear and a positive addition. That clear principles are set out and the importance of highlighting the need for staff to have training in PBS, as people need helpful tools and skills to support their day-to-day working.

It was agreed, that overall this chapter describes the importance of PBS and recognises and clearly demonstrates that PBS is most effective and successful when it is implement across a whole service or organisation, rather than just an individual.

The National Independent Safeguarding Board (NISB) welcomed the opportunity that the issuing of this guidance will provide for modernising and practice in light of contemporary thinking and in a way that is accessible to those working in relevant settings.

Three respondents raised concerns about how PBS is expressed in the document, suggesting that there has been agreement among leading academics within this field that this approach should be referenced as "Positive Behavioural Support" rather than "Positive Behaviour Support". There was a respondent who felt that the evidence on PBS is not sufficient to include it as a practice approach.

A general comment was made that there is no specific mention of dementia care, and the Powys Teaching Health Board believes that this approach should be specifically extended to cover this area of practice, especially as a PBS approach is the most valuable tool with this client group.

A suggestion was made that the language throughout the document should be easily understandable and accessible. The terminology used needs to be inclusive for both adults and children and young people throughout the whole document.

A number of responses identified that the Framework includes a reference to Appendix 2 this had been left in, in error, from an earlier draft.

**Welsh Government Response**

The Advisory Group felt strongly that the Positive Behavioural Support (PBS) approach is well placed to promote practice, which will support the ambitions of the Welsh Government to reduce restrictive practices. The Welsh Government will consider the specific comments on dementia care and on the language and terminology in drafting the final Framework.

**Question 4:**

**Does Chapter 3 explain the principles for practice to support the reduction of restrictive practice in a clear and useful way?**

Total 83	Yes 62	No 3	Unsure 9	No response 9
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**Summary-** The majority (83%) of responses to this question agreed that the principles are clear and clearly emphasises the key principles for practice in order to help support the reduction of restrictive practice.

Comments included welcoming the depth of information in refining exactly why these components are essential and what these components consist of in practice.

One organisation commented that there was not enough emphasis on the importance of providing individuals with an appropriate method of communication so that they can express their needs, wishes and feelings.

One organisation felt that there needs to be a clearer link with risk here: “Section 80 sets out good principles but lacks the ‘how’ “.

**Welsh Government Response**

The Welsh Government will consider the specific comments made, including those on communication needs. The Framework is intended to provide a high-level set of principles and expectations for practice, each sector will need to consider ways in which to support implementation in a way, which explains what these expectations means for practice in the sector.

**Question 5:**

**Does Chapter 4 explain the principles of the use of restrictive practices in a clear and useful way?**

Total 83	Yes 61	No 8	Unsure 7	No response 7
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**Summary-** 80% agreed that the chapter summarises in a clear and refined way exactly what the policy should be used for in relation to restrictive practice and that it also reflects evidence based practice in reducing restraint across sectors and populations.

The All Wales Speech and Language Advisory Forum said: *“We welcome and support the view that where restrictive practice is a necessary component of clinical intervention they should be the least restrictive measures possible, monitored frequently and documented clearly with a clear rationale for their use”.*

A suggestion was made to include information on the purpose and importance of recording incidents of restrictive practice.

**Welsh Government Response**

We will review this chapter taking into consideration specific consultation responses.

**Question 6:**

**Is the information included in the glossary and appendix useful?**

Total 88	Yes 70	No 0	Unsure 7	No response 6
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**Summary-** 91% agreed that the information provided in the glossary and appendix was useful providing a reference to the variety of definitions that are mentioned throughout the document making it simple, clear and understandable.

Suggestions were made for Welsh Government to revisit the glossary to revise some of the definitions used to ensure that they were clearer to all users of the Framework.

A few also referenced that some of the terms listed in the glossary are not referred to at all in the main body of the document, which could cause confusion as to their being included. A suggestion was made to reconsider whether they are needed.

**Welsh Government Response**

The Welsh Government will review the glossary and the terms used in the main body of the framework in light of specific comments.

## Question 7:

**We would like to know your views on the effects that the guidance would have on the Welsh language, specifically on**

- i) opportunities for people to use Welsh; and
- ii) on treating the Welsh language no less favourably than English.

What effects do you think there would be? How positive effects could be increased, or negative effects be mitigated?

**Summary-** In total, there were 43 specific view responses to this question. The theme which arose most frequently in responses was the questioning of the relevance of the question within the consultation; stating that they do not feel the Welsh language has any relation to the proposal; or, less frequently, stating that the proposal will have no impact (positive or negative) on the Welsh language as the issues are unrelated. Respondents also noted that no changes are necessary to ensure that the Welsh language is treated no less favourably than the English language.

Others commented that all information concerning the proposal and its implementation should be communicated bilingually, as well as in Easy read format and produced at the same time as any full documents.

There was a general consensus from responses received that children and young people should not only be able to access services in the language of their choice, but that they are dealt with appropriate to their needs, which should also include sign, braille, etc. and that all communication and dissemination materials should be made equally accessible in both Welsh and English.

### **Welsh Government Response**

Welsh Government has noted the comments made in the consultation and is satisfied that the Framework will have no negative impacts on the Welsh Language. An emphasis on enabling communication in a way that meets the needs and preferences of the individual supports one of the Welsh Government's *Cymraeg 2050*'s strategic aims of increasing the use of Welsh. We will review the Framework to make sure that information on the need to provide services and support in a preferred language and to consider any other communication needs is clearly set out.

**Question 8:**

**The Welsh Government is interested in understanding whether the proposals in this consultation document regarding this guidance will have an impact on groups with protected characteristics. Protected characteristics are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex, and sexual orientation. 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?**

Total 62	Yes 54	No 8	Unsure N/A	No response 21
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**Summary-** 87% of those who responded to this question agreed that it will have a positive impact on groups with protected characteristics.

Comments set out that as the Framework is a standardised document, strengthened by legislation, protecting all persons, including those with vulnerabilities, it will improve the quality of life of individuals that are most likely to display behaviours that challenge and are like to be positively impacted.

Respondents also suggests that *“the implementation of this framework will have a very positive impact on groups with protected characteristics, and will directly address issues of social in quality. People with protected characteristics are currently disproportionately subjected to restrictive practices and restraints across all sectors. The close alignment with human rights will help ensure and promote social equality. In particular it will benefit vulnerable adults and children with learning disabilities, mental health issues, acquired brain injury, Autism, people with emotional problems and people with dementia. It will also benefit families and carers of vulnerable people.”*

The Gwent Regional Partnership Team commented that: *“This framework is a much needed step to a more positive and understanding approach to care. This is much more person centred and looks at treating the needs of each individual person instead of using a blanket approach to care”* and that *“This new understanding can also bring focus to more positive engagement such as supported learning and develop. It will help support people to have brighter futures and is a much more ethical approach to supporting people.”*

One organisations said *“It will give a positive impact across all due to the principles of PBS. It will ensure people are relational and not purely behavioural in their approaches. It fosters the culture for people to listen and communicate with each other. Those groups who are more marginalised and discriminated against will have to be listened to”.*

Mind Cymru said that the Framework would be strengthened by stating explicitly that organisations should collect data on protected characteristics in relation to the use of restrictive practices and this should be used to monitor equality issues and improve practice.

### **Welsh Government Response**

Welsh Government are grateful to the respondents who provided comments. The Welsh Government is satisfied that the Framework will not impact negatively on groups with protected characteristics.

We will use the responses we have received to inform our assessment of the impact on equality. We will also give consideration to specific comments in drafting the final Framework.

### **Question 9:**

**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 report them:**

**Summary-** In total there were 34 responses to this question, ranging from organisations writing to provide their views or evidence in expressing their thoughts on restrictive practices or from individuals wishing to provide views or evidence of experience of restrictive practice.

The Equality and Human Rights Commission recommended that the Welsh Government:

- Takes action to ensure the framework leads to real improvements in practice by developing an implementation plan, establishing a clear role for regulators, and promoting the guidance among service providers. We recommend that the effectiveness of the framework is kept under review and that additional steps are taken if it is not adopted sufficiently by providers. This could include giving the guidance or aspects of the guidance statutory force, or developing further guidance to support improvements in specific sectors.
- Clearly sets out the need for service providers to collect and monitor data on the use of restraint, including on people with different protected characteristics. This data can be used to understand and tackle the disproportionate use of restraint on particular groups and to assess and ensure compliance with the public sector equality duty.
- Ensures that the guidance is fully comprehensive by adding further information as highlighted in our response, including advice about the particular considerations relevant to children and the use of restraint, the legal basis for restraint, the risks of face-down restraint, and the need for effective complaints procedures.

Support for implementation of the Framework through work force development and measures to review implementation was a theme running through other responses to this final question.

The Challenging Behaviour Foundation set out that the Scottish Government has also committed to involving children, young people and their families in drafting guidance and said that further development of the guidance needs to actively involve individuals who have experienced restrictive interventions and their families, including those with learning

disabilities and autism who are non-verbal. The consultation document were made available in Easy Read and Youth Friendly versions.

A group of 9 Service users responding on behalf of Ludlow Street Healthcare provided a combined response. They felt that the recommendations were clear however, they were concerned that they would not be followed through. They felt that there needs to be a change so that staff understand human rights and there is a need to change the 'us and them' culture that often exists. From their experience, they felt that complaints were not always taken seriously, particularly when they felt that restraint had been used inappropriately. They suggested that making sure that complaints are processed by an independent person could help with this.

**Welsh Government Response** The Welsh Government welcomed all the suggestions made and we will consider these in the drafting of the final Framework. We are aware that sector level support for implementation will be crucial, through policy, training and practice. The publication of a final Framework is only the first step.

## **6. Conclusion**

Overall, the consultation draft Framework has been welcomed and positively received. Our response to each question above sets out the ways in which we will use consultation responses to inform the final Framework.

Some suggestions have been accepted and will be included in the Framework; however, other recommendations will not be included but can be considered during the ongoing work relating to monitoring and implementation and will be shared for consideration by the relevant Welsh Government departments who have lead responsibility within their area of work.

The Welsh Government will consider in more detail the best options for supporting the effective implementation of the Framework and the expectations set out in it, in each relevant sector.

**Annex A** – Full list of consultation respondents who gave permission for their responses to be shared

<b>No</b>	<b>Confidential Yes/No/No response</b>	<b>Organisation/On behalf of</b>
1	Yes	
2	Yes	
3	Yes	
4	No response	Gwent Regional Partnership Team
5	Yes	
6	Yes	
7	No	"I am a Buddhist"
8	Yes	
9	Yes	
10	Yes	
11	Yes	
12	Yes	
13	No	39/SA14 6BX
14	Yes	
15	Yes	
16	Yes	
17	No	Cardiff and Vale UHB
18	Yes	
19	No	University of Strathclyde
20	No	Cardiff and Vale NHS UHB
21	No Response	"Parent and I also have asd" Sarah Jane Daniel
22	Yes	
23	No	Torfaen People First
24	No	Mind Cymru
25	No	All Wales Challenging Behaviour Community of Practice
26	No	Improvement Cymru
27	No	National Association of Independent Schools and Non-Maintained Special Schools (NASS)
28	No	Swansea Council - Social Services
29	No	Gwent Community Psychology, Child and Families Psychology and Therapies Service, ABUHB
30	No	Psychologists for Social Change
31	No Response	Andrew Guy
32	Yes	
33	Yes	
34	Yes	
35	No	Flintshire County Council
36	No	Care without Compromise LTD

37	No	Caldecott Foundation
38	No	PRRICE consisting of all Health Board Representation within Wales
39	No	Adenydd, Registered Charity number 1182052
40	No response	No name
41	Yes	
42	No	National Independent Safeguarding Board
43	No	Beam Consultancy
44	Yes	
45	No	Learning Disability Wales
46	No	University of Vermont Medical Centre, Healthy Design LLC
47	No	Mental Health and Learning Disabilities, Powys Teaching Health Board
48	Yes	
49	No response	Cwm Taf Morgannwg Univeristy Health Board
50	Yes	
51	No	Aneurin Bevan University Health Board
52	Yes	
53	Unknown	Easy read – details not available
54	No	Hywel Dda University Health Board
55	No	Mudiad Meithrin
56	Unknown	Easy read – details not available
57	Yes	
58	No	The Down's Syndrome Association
59	No	All Wales People First
60	No	Clybiau Plant Cymru Kids' Clubs
61	No response	Children's Commissioner for Wales
62	No	UCAC
63	No response	Alzheimer's Society Cymru
64	No response	Welsh Therapies Advisory Committee
65	No response	All Wales Speech and Language Advisory Forum
66	No response	Education Workforce Council
67	No response	Social Care Wales
68	No response	Powys Teaching Health Board
69	No response	ASCL Cymru
70	No response	Equality and Human Rights Commission
71	No response	Chief Inspector of Education and Training in Wales
72	No response	Royal College of Nursing Wales
73	No	Ludlow Street Health Care
74	No response	Association of Educational Psychologists
75	No response	North Wales Community Health Council
76	No response	NASUWT
77	No response	Ludlow Street Health Care Group Ltd

78	No response	The Challenging Behaviour Foundation
79	No response	Learning Disabilities Advisory Group (LDMAG)
80	No response	Swansea Bay University Health Board
81	Yes	
82	No response	Cardiff Council
83	No response	Royal College of Psychiatrists