Number: 48602

Welsh Government

Consultation – Summary of Responses

Single Unified Safeguarding Review Draft Statutory Guidance

The objectives of the consultation with key stakeholders were to:

- share the draft statutory guidance principles and summarise its key objectives;
- listen to any concerns and discuss any queries in relation to the draft statutory guidance;
- explain the next steps.

September 2023

Mae'r ddogfen hon ar gael yn Gymraeg hefyd / This document is also available in Welsh
Rydym yn croesawu gohebiaeth a galwadau ffôn yn Gymraeg / We welcome correspondence and telephone calls in Welsh

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Overview

This document provides a summary of the responses received by the Welsh Government to our consultation:

Welsh Government Consultation on the Single Unified Safeguarding Review: draft Statutory Guidance

The consultation was published on 6 March 2023 and closed on 9 June 2023. This exercise targeted over 315 individuals and resulted in the submission of 48 responses from a range of stakeholders and interested parties.

Action Required

This document is for information only.

Further information and related documents

Large print, Braille and alternative language versions of this document are available on request.

Contact details

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Additional copies

This summary of response and copies of all the consultation documentation are published in electronic form only and can be accessed on the Welsh Government's website.

Link to the consultation documentation: https://www.gov.wales/single-unified-safeguarding-review-statutory-guidance

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Purpose of this Report

To outline the:

1. consultation and engagement undertaken and stakeholders that have been targeted;
2. responses received and analysis undertaken;
3. summary of key themes and issues raised and the Welsh Government Response; and
4. next steps on further work that will be undertaken as a result of this consultation.

Introduction

The development of the Single Unified Safeguarding Review (SUSR) process in Wales has been undertaken to ensure that following a significant event that triggers the SUSR review process, all aspects of the review are considered across the relevant agencies, devolved and non-devolved, rather than in organisational silos. The SUSR Draft Strategy Guidance has been produced with a wide range of key stakeholders to outline the process. The Draft Statutory Guidance has been consulted upon, in order to gain feedback on its content and to determine if it effectively:

- clarifies what a SUSR is;
- incorporates relevant legislative requirements;
- explains the various roles and responsibilities arising under the SUSR process;
- clarifies the process to be undertaken where a SUSR is instigated; and
- addresses issues around inclusivity, particularly in relation to victims and their families.

The Draft Statutory Guidance is aimed at practitioners, service providers and key stakeholders who may find themselves involved in undertaking a Single Unified Safeguarding Review. This can range from social workers, victims and families, police and health professionals, key partnerships including Safeguarding Boards and Community Safety Partnerships and the third sector.

The targeted audience is therefore quite extensive and has required different methods of engagement, to ensure that stakeholders were able to participate in the consultation process in a proactive and inclusive manner. Welsh Government guidelines for engagement and consultation were used as outlined below:

- ensuring engagement is accessible:

    - producing easy-read and young people versions of the draft statutory guidance and associated consultation response forms that were placed online;
    - liaising with key partners to identify and facilitate opportunities for victim and family engagement, including the establishment of the Victim and Family Reference Group;
    - undertaking accessible and facilitated individual meetings, workshops, focus groups, user panels and stakeholder meetings; and
    - ensuring consultation materials were provided in Welsh and English and live translation made available at public consultation engagement events when required.
- publishing the consultation on the https://www.gov.wales/consultations web page with access to an online consultation form, consultation documents and consultation response forms;
- promoting the consultation through a range of media channels, using an animated explainer and video from the Deputy Minister for Social Services; and
- using where appropriate, already planned events and meetings to maximise attendance (e.g. Safeguarding Board and Community Safety Partnership meetings).

Consultation and Engagement Undertaken

Following a pre-consultation stage to review the initial draft of the Statutory Guidance with key partners, the Welsh Government commenced a formal public consultation process for the draft SUSR Statutory Guidance on 6 March 2023. The consultation period ran until 9 June 2023, a fourteen-week period to take into account bank holidays. In order to target as many individuals and organisations as possible the SUSR Team (made up of officials from Welsh Government, Dyfed Powys Office of Police and Crime Commissioner and the Wales Safer Communities Network) and Fradd Consultancy undertook the following forms of engagement:

- 3 Focus Groups meetings in North, Mid and South Wales
- 1 online Focus Group Meeting
- Individual meetings for example with Chief Constables; Third Sector leads and the Home Office
- Presentations at stakeholder meetings (details below)

This approach enabled a wide range of organisations and individuals to be included in the consultation from both the third and public sector including:

- Children's Commissioner for Wales
- Community Safety Partnerships
- Fire and Rescue Services
- Health Boards
- Local Authorities
- National Independent Safeguarding Board
- National Youth Advocacy Service
- Police Liaison Unit
- Public Health Wales
- Safeguarding Boards
- St John's Ambulance
- Universities
- Welsh Probation Service
- Welsh Women's Aid

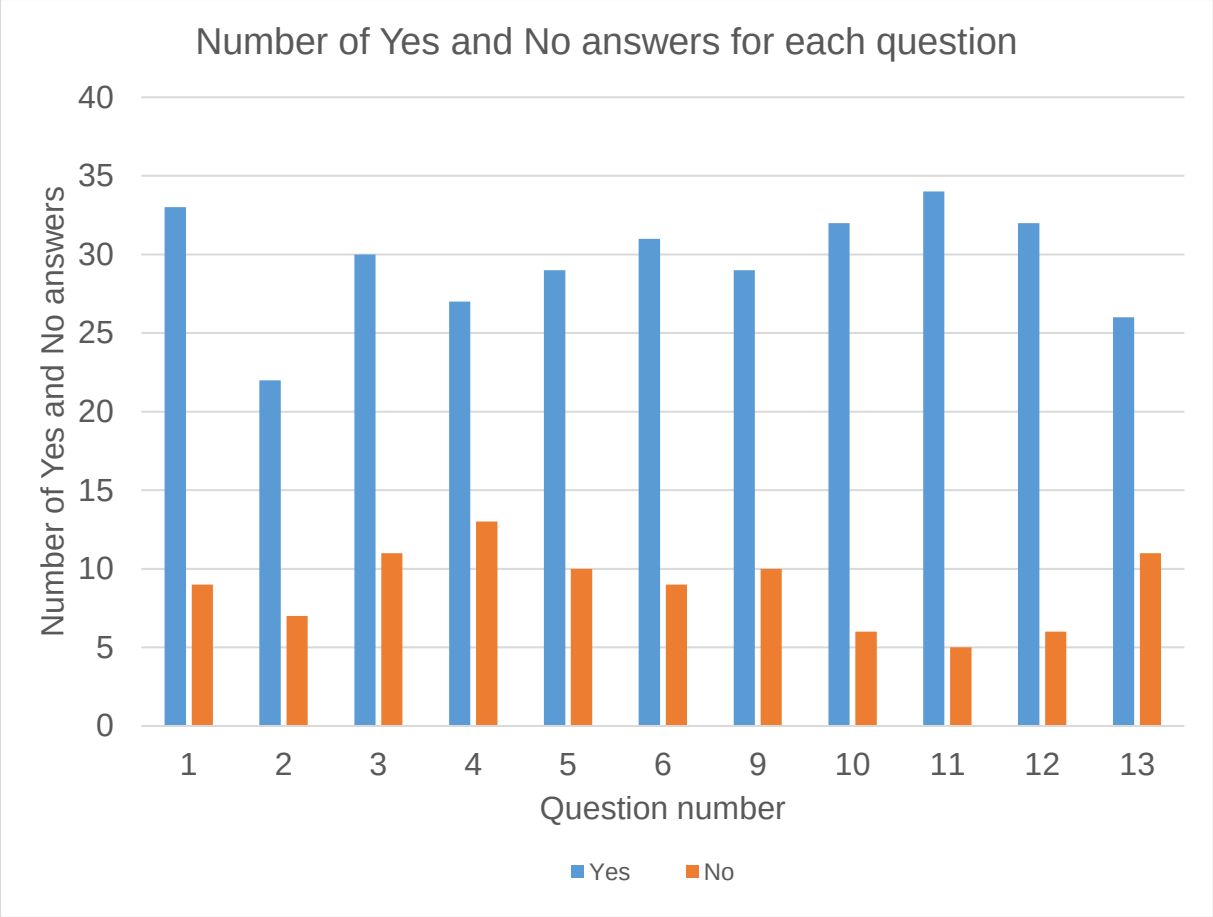
In total over 315 individuals attended the various engagement events outlined above.

Responses received and analysis undertaken

This section provides a summary of the responses received in relation to each question provided in the SUSR consultation response form. The graphs and charts in Appendix One provide information on the 'yes' and 'no' responses received. Appendix Two is a list of all those that responded to the consultation exercise. The full table of responses can be requested by emailing the SUSR mailbox at SUSRWales@gov.wales. All of the consultation responses will be considered when making changes to the Single Unified Safeguarding Review Statutory Guidance.

It is important to note that a responder in many cases is responding on behalf of a partnership, but is only identified as a single entity within this report, therefore the underlying figure could be far greater.

The following graph gives an overview of the 'yes' or 'no' responses received during the consultation for each of the questions.



Question 1 - Does the Introduction provide clarity on the aims and reasons for producing the Single Unified Safeguarding Review process (SUSR)? Is the Introduction as set out in Section 1 clear and easy to understand?

The majority of respondents, 79% replied with 'yes' to this question and 21% responded with 'no'.

In summary, the responses highlighted that the structure of this section could be improved to ensure that it does not use complex language, is not too lengthy or repetitive. Respondents also commented on the diagrams and how these could be simplified for the reader.

The acknowledgement of the current complexity of partnerships in Wales in this section was welcomed. The new governance structure (including the Single Unified Safeguarding Review Co-ordination Hub and the Ministerial Board) was also welcomed by the respondents. However, some felt that the governance section could have been given more clarity in terms of the specific roles of each of the boards and groups.

Overall, respondents welcomed the key aim of the Single Unified Safeguarding Review process to reduce duplication to lessen the burden on both victims and their families and professionals. However, some respondents wanted to see the voice of the victim strengthened in this section.

Concern around the capacity of Reviewers and Safeguarding Boards was highlighted and proved to be an ongoing theme in the consultation responses to all questions.

This is discussed in more detail in the Summary of Key Themes section within this document.

Question 2 - Do the Principles which underpin the SUSR set out in Section 2 achieve the desired outcome of a proactive approach to taking solutions forward and a positive shared learning culture which avoids multiple reviews of an incident, helping to reduce further trauma for victims and families?

The majority of respondents, 76% replied 'yes' to this question and 24% replied 'no'.

The culture of learning which the Single Unified Safeguarding Review process will achieve was mentioned as beneficial to the review landscape in Wales, and detailed that an open and transparent approach will be important going forward. It was also noted that the principles were victim and family focussed, but there is a need for greater clarity and consistency around the 'victim' terminology. It was suggested that the term 'victim' is not appropriate for some individuals who may more accurately consider themselves as 'survivors'. It was also highlighted that sometimes neither of the terms 'child' or 'adult at risk' appropriately described those who are 'victims' of domestic abuse or homicide.

Respondents suggested that the principles in this section should link with existing working principles which are currently used such as 'Hallmarks of Effective Practice' and 'Sustainable Development Principle'. Some respondents also asked for specific wording around equality, inclusivity and diversity in this section to ensure this forms part of the underlying principles of the process. Other respondents requested that wording around Police and Crime Commissioners, the Victim's Commissioner, the Domestic Abuse Commissioner, third sector agencies and specialist services are all strengthened.

The Wales Safeguarding Repository was highlighted as being a positive initiative and addition to the process.

It was noted that there was a need for substantial training for Reviewers, Review Panel Chairs and members for the SUSR to be successfully implemented.

Question 3 - Does Section 3 provide the clarity required to determine when a SUSR should be undertaken and are the criteria clear and useful?

The majority of respondents, 73% replied 'yes' to this question and 27% replied 'no'.

In summary, the respondents felt that the criteria for Adult and Child Practice Reviews were clearer than the criteria for Domestic Homicide Reviews, Mental Health Homicide Reviews and Offensive Weapons Homicide Reviews. Clarity was requested on what would happen if a case met multiple criteria in terms of who would lead on the review. Respondents also felt that there needs to be more information about the differences between a 'concise' and 'extended' review in this section.

Issues were raised regarding the Domestic Homicide Review Home Office Quality Assurance Panel and whether reviews meeting the Domestic Homicide Review criteria would still need to be sent to this panel. This also included concerns around the delays currently experienced when reviews are sent to the Quality Assurance Panel. Some respondents also requested for more information about the departures from the

Domestic Homicide Review guidance which will enhance the Single Unified Safeguarding Review process. Some respondents also wanted further clarity in this section on the relationship between Safeguarding Boards and Community Safety Partnerships. This is discussed further in the Summary of Key Themes section below.

It was suggested that some examples of when to undertake a review would be a helpful addition to this section, and that an evaluation of the Single Unified Safeguarding Review is carried out to understand its impact on the review landscape in Wales and to ensure that it is running as expected and needed. These two points were made in response to a number of the consultation questions posed.

Question 4 - Does Section 4 provide clarity of the SUSR process and is there sufficient detail for each stage?

The majority of respondents, 67% replied 'yes' to this question and 33% replied 'no'.

Four respondents requested guidance for creating an agency timeline within this section. It was felt that this would provide some helpful consistency across different regions. There were also requests for specific timescales to be added to this section to help Reviewers and Review Panels to stay on target to complete the review process in a timely manner. Respondents also suggested that a link to the template Toolkit should be provided in this section so that consistency is ensured across all reviews. Eight respondents felt that the diagram in this section could be improved as it is currently unclear.

Three of the respondents suggested that there could be more information about the monitoring of Action Plans. It was highlighted that there needs to be local escalation of recommendations and actions before going straight to the Ministerial Board. This could be through escalation via the Public Services Boards and Regional Partnership Boards.

Question 5 - Are each of the Roles and Responsibilities as set out in Section 5 clear and useful?

The majority of respondents, 74% replied 'yes' to this question and 26% replied 'no'.

It was suggested by one of the respondents that this section should include information about a process for addressing professional disagreements if they were to occur during the process. It was also suggested that information about support for Reviewers should be referenced in this section. Some felt that the Offensive Weapons Homicide Review is "over-referenced" within this section and makes the guidance confusing, and that there needed to be more clarity provided in the paragraphs which mention Domestic Homicides.

Respondents also requested more information and clarity about how Reviewers and Review Panel Chairs are appointed and who it is that appoints them, and how independence could be addressed as some regions were concerned about "losing" their local Reviewers to other regions. It was suggested that more information about the Approved Chairs and Reviewers List would help to mitigate this concern.

Four respondents felt that a subsection about the Chair of the Review Panel was missing from this section and would be a helpful addition to the guidance.

Question 6 - Do paragraphs 5.6-5.9 and appendix 3 of the guidance help Reviewer(s) to consider whether community partners (such as independent and third sector organisations) should be engaged in the SUSR process? If not, how could the guidance improve on this?

The majority of respondents, 77% replied 'yes' to this question and 23% replied 'no'.

It was suggested by one of the respondents that this would be an appropriate section to highlight that advocacy organisations should be able to make up part of the Review Panel. Five respondents also gave other suggestions for additions to the list in Appendix three in the statutory guidance. These suggestions include Housing Associations, Welsh Women's Aid and other Violence Against Women, Domestic Abuse and Sexual Violence organisations. It was also requested that clarity is given in this section to the breadth and specialisms of the third sector representatives who would be considered community partners.

Some respondents also suggested that this section should highlight that the inclusion of community partners in the review process should be on a case-by-case basis, to determine who would be best placed to represent the subject of the review. It was also requested that due regard should be given to the impact of the review process on the Panel Members, by providing more detail on the work involved in being a Panel Member and how they are supported by the statutory partners during the process. Information on how the Panel Members will be approached and engaged with the process was suggested as an important point to include in this section. The importance of this could also be emphasised with a list of reasons to engage with community partners as this would highlight the benefits of this as a form of best practice. Respondents also felt that a timescale offering the Review team guidance on how long it should take to assemble a Review Panel would be a helpful addition to this section.

Question 7 - Do paragraphs 5.7 – 5.9 and Appendix 3 of the guidance help Reviewer(s) to consider whether specified information should be requested from a 'qualifying person or body'? If not, how could the guidance improve on this?

Some respondents stated that this section required no further clarity as it is self-explanatory. However, a few additions were suggested by the respondents to ensure that the section is as helpful as possible. For example, it was suggested that there should be a reminder in this section for the Chair of the Review Panel to ensure that membership of the Review Panel is representative of the victim so that their voice is captured in the process, and the sharing of information by organisations, such as Primary Care, should be stressed to address the current challenges experienced. This point also came up in question 12 and is discussed further there.

Three respondents pointed out that this section was not written in plain language and that the legal terminology may be difficult for some readers to understand. One respondent pointed out that there are clearer definitions of 'qualifying person or body' in Working Together to Safeguard People Volume One which could be signposted to

in this section. Respondents also requested a definition of ‘diverse lens’ for clarity in this section. Three people also noted that the use of the word “power” in this section did not seem appropriate and could be changed.

It was also noted that non-Welsh Safeguarding Boards and organisations and their engagement with the review process needs to be included. This also extends to how learning from their reviews, which are relevant to Welsh organisations, is captured and monitored.

Question 8 - To what extent do you think engagement from relevant community partners or the supply of specified information from a ‘qualifying person or body’, where appropriate, could assist the SUSR process?’

This question had similar responses to question 7, especially regarding the language used. It was highlighted by many of the respondents that community partners may be able to bring insight to the case, which may not be available elsewhere. It was commented that community partners may be able to provide context and a wider view to chronologies and reports, and that review teams would need to consider each case on an individual basis to determine which community partners would need to be involved. It was also noted that this section has the potential to encourage agencies to share information in cases that they may have previously had reservations.

It was highlighted that community partners would need to be made aware that they may need to engage in the review process, as engagement is not currently consistent. This would need to include explaining to community partners what would be expected of them in order to meet the needs of the review. It was also noted that it would be helpful for the community partners to receive the learning which comes out of the review so that they can implement any changes to their own processes and understand themes coming out of reviews.

Question 9 - Are the guidelines for engagement with victims, families and principal individuals as set out in Section 6 clear and useful? Consider whether it is clear that the Reviewer(s) and Review Panel need to approach each participant in the review on a case-by-case basis and ensures that the victim, families and principal individuals are at the heart of the review process.

The majority of respondents, 74% replied ‘yes’ to this question and 26% replied ‘no’.

Some respondents were happy to see that the family’s voice is represented in this section, especially the detail on the involvement of children and young people in the review process. However, others felt that the guidance was weighted towards assisting the agencies and professionals rather than keeping the victim at the centre of the guidance. Respondents suggested that a risk assessment and needs assessment should be carried out at the beginning of the review process and should be detailed in this section. This would help to establish the most appropriate levels of engagement with the subject of the review and/or their family. Respondents also requested that

information about whose responsibility it is to engage with the subject of the review and/or the principal individuals is added to this section.

As well as formal advocacy services, respondents wanted to give acknowledgement in the guidance to individuals who would prefer to have a family member or friend to act as a non-professional advocate or support system within the review process. One respondent also posed the question about giving the individual the opportunity to give their preference on whether a male or female Reviewer is commissioned. Another respondent asked for detail in this question on when and how the third sector will be expected to contribute to this part of the process linking into aspects such as advocacy. It was also questioned how learning will be communicated to the subject review and/or the principal individuals after the review is completed. This could be extended to the changes implemented as a result of the actions which came out of their review.

There were also some comments on the language used in this section. This included that 'perpetrator' may not sit well within the 'principal individual' umbrella and may be more appropriate to keep this separate along with a reminder to Reviewers to use 'alleged perpetrator' where there has not been a conviction. Three respondents also highlighted that the language around "so called Honour Killings" needs to be updated to reflect this updated terminology. Another respondent also requested that reference to the United Nations Convention on the Rights of the Child were made in this section. Finally, three respondents welcomed the reference to having the option to communicate with the review process in Welsh, but also suggested that this was extended to include other languages.

Question 10 - section 7 outlines the number of stages which need to be undertaken as part of the review process. Are these stages in the appropriate chronological order and clear in terms of what is required?

The majority of respondents, 84% replied with 'yes' to this question and 16% replied 'no'.

The respondents agreed that the section is in chronological order, however there was a general consensus that more detail is required. This includes adding agreed timescales for all of the review steps to guide the process. Respondents also agreed that information on agreeing the review, appointing the Chair, Reviewer and Review Panel and agreeing the Terms of Reference would be helpful in this section. Victim and/or family engagement was also a requested addition to this section, rather than just mentioning it in the diagram. Clarity on who needs to publish the report for 12 weeks also needs to be included in this section. The respondents also pointed out the need to highlight that staff attending the learning event will receive welfare and general support. There were also questions around who had the responsibility to create the genogram for the review process.

Respondents also pointed out some issues with the terminology used in this section. There were references to the outdated terminology of Serious Case Reviews which was used in this section which the respondents felt could be updated to reflect the current landscape. The word "affordable" when referring to creating actions was

deemed as inappropriate and respondents felt that this should be replaced with ‘achievable’ instead. Concerns were also raised that this section contradicts the Domestic Homicide Review guidance which says ‘It is often incorrectly assumed by local areas that no contact with agencies indicates a Domestic Homicide Review is not required. In fact, a Domestic Homicide Review should probe why there was little or no contact with agencies’.

Finally, it was noted that the diagram included in this section was too confusing and needed revising.

Question 11 - Does Section 8 ensure that learning is a key component of the SUSR process and a statutory obligation by providing clarity on how learning and information is shared as part of the wider process including working with relevant partnerships such as Community Safety Partnerships and Public Services Boards?

The majority of respondents, 87% replied with ‘yes’ to this question and 13% replied ‘no’.

The respondents highlighted a number of points which were felt to be positive learning additions to the review process. This included the Wales Safeguarding Repository which was considered a helpful addition. However, it was requested that further detail be added in this section to determine who will have access to the Repository and to provide clarity around the term ‘relevant stakeholder’. The addition of Bi-annual Themed Dissemination Events was also welcomed by respondents. Emphasis was given to the benefits that highlighting key themes across Wales would have on undertaking a review process, as they can be referred to throughout the process. The Mid-term learning option was also seen as a positive addition to the process as review teams would not have to wait until the end of the review to disseminate key learning. There was an overall feeling from the responses that the Single Unified Safeguarding Review process will strengthen the learning element going forward.

It was suggested that the guidance should include more detail on Multi-agency Professional Forums at an earlier point in the document, to give further context to its inclusion in this section.

One respondent also suggested that recommendations which impact Police and Crime Commissioners or the Police could go to the respective Police and Crime Panels so they can monitor the implementation of learning. Further to this, respondents also suggested that a list of key stakeholders should be kept and updated to ensure that the right people are receiving all learning from reviews on a pan-Wales basis.

Some of the respondents had questions regarding evaluation of the process, and noted that collecting some baseline data could be useful when trying to determine the impact of the process and the effectiveness of the Wales Safeguarding Repository. It was also questioned how we would ensure that learning is having an impact on practice going forward. Respondents also wanted to know how the Co-ordination Hub would link in with the Learning and Development subgroups across the regions.

Question 12 - Does Section 9 set out the Data Protection considerations in a way that is clear and useful? Would you like to see a clear legal obligation in this section requiring review partners to share information for SUSR review purposes when requested, if one could be found?

The majority of respondents, 84% replied with 'yes' to this question and 16% replied 'no'.

One respondent stated that they were not aware of any issues with agencies sharing information for the purpose of reviews. However, the majority of respondents indicated that having a legal obligation to share information would be welcomed as they have experienced challenges when requesting some information. Two respondents said that some agencies feel unable to share information on perpetrators without consent and expressed their concern that this is a huge barrier to learning.

Overall, respondents found this section of the guidance clear. However, there were some comments which indicated areas which they would like some more detail on. This included the issues of anonymisation and the use of pseudonyms to ensure that Reviewers properly understand their obligations regarding this. Another respondent highlighted the omission of the role of data controllers, to ensure that responsibilities and duties are made clearer in this section. A few respondents also suggested that consent should be considered and mentioned in this section so that review teams can understand how it may influence the decisions of agencies when deciding whether to share information. Finally, one respondent suggested that extra resources and guidance for organisations who are not as familiar with the process would be beneficial.

Question 13 - Does the guidance provide sufficient clarity and flexibility to ensure that key partners including Community Safety Partnerships and Public Services Boards will be effectively engaged and involved within the SUSR process, where this is appropriate and helpful?

The majority of respondents, 70% replied with 'yes' to this question and 30% replied 'no'.

Respondents recognised that the arrangements between Safeguarding Boards, Community Safety Partnerships and Public Services Boards will take a while to be accommodated in some areas. There was recognition that there are already relationships in place between community safety and safeguarding. However, the links are new and the Single Unified Safeguarding Review guidance may be adding a level of complexity that may not be achievable without challenges. Two respondents noted that the Appendix table included in the guidance is helpful in setting out the roles and gives clarity on who should be involved in the review process. One respondent noted that this guidance was welcomed as communication between different Boards has previously been inconsistent. It was noted that this process will ensure improved

communication by making stronger links between Boards and Partnerships through an obligation to participate.

Respondents also gave some further suggestions that could be added to the guidance to strengthen this section. Some of the wording such as “in partnership” with Community Safety Partnerships and “expected to attend” could be strengthened to capture this point. It was suggested that the specific expectations about engagement with Public Services Boards could particularly be strengthened as this is currently limited within the guidance, and the escalation of action plans and recommendations to the Public Services Boards would be a beneficial way of engaging with them.

Some respondents requested more details on how Safeguarding Boards would contact and communicate with the relevant partnerships. Linked to this, there were questions about how disagreements between the Boards and partnerships would be resolved and the timescales for doing so. One respondent suggested that it would be helpful to add recommended engagement timescales to the diagram. One respondent also suggested that it would be helpful to give more information about engagement with non-devolved services in the guidance. Finally, one respondent questioned why reviews which meet the criteria for Adult and Child Practice Review is not included within the scheduled engagement between the Safeguarding Board and the Community Safety Partnerships. They felt that it would be beneficial for all relevant elements within the review to form part of the dialogue to further strengthen the relationship between community safety and safeguarding.

Question 14 - What in your view would be the likely impacts upon individuals and groups with protected characteristics of the ways of working set out in this guidance? Your views on how positive effects could be increased, or negative effects could be mitigated, would also be welcome. Please use the text box to explain your reasoning.

A number of issues were raised in relation to the impact of a review upon individuals. The key points raised referred to the need to reference the Equality Act 2010, to ensure that professional jargon is avoided and that greater signposting should be provided to specialist advocacy provision. Reference was also made to the need to capture early in the process individual needs, such as preferred language and disability requirements, which should be captured at the outset through an Integrated Needs Assessment. Reference to gender anonymisation was also made in terms of how this may not be appropriate in relation to the nature of some of the potential cases that may arise.

The importance of the Case Review Group and the need for appropriate representation on it in relation to the individual was also expressed, along with the need for appropriate training for Chairs and Reviewers to include intersectionality, unconscious bias and diversity. It was also suggested that there should be an additional principle relating to these aspects at the outset of the guidance

The welfare of Reviewers was identified and how this would be addressed, especially where difficult and upsetting information has to be processed

Question 15 - What in your view are the likely other impacts of the ways of working set out in this guidance? You may wish to consider, for example, benefits, and disbenefits; costs (direct and indirect), and savings; other practical matters. Your views on how positive effects could be increased, or negative effects could be mitigated, would also be welcome. Please use the text box to explain your reasoning.

Learning from mistakes was identified as a significant benefit, but it was also recognised how this may require a huge cultural change in some settings, in order to move away from one of blame, therefore training in relation to this aspect would be crucial. In addition, there was general agreement that the reduction in the number of reviews would prevent re-traumatisation.

Capacity within Safeguarding Boards to undertake Reviews was once again mentioned and the associated resource pressures. The potential to have standard payment rates for Reviewers and Panel Members was suggested to address existing disparities and capacity issues.

The need for an effective training package with associated toolkits was raised, to ensure that the process was both streamlined and consistent.

It was felt that the approach would have a positive impact on partnership working across Wales, whilst the repository would provide the means for sharing learning across regions and key themes and areas for development.

Question 16 - We would like to know your views on the effects that the SUSR process would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

The importance of interpretation at learning events was identified, to ensure that the Welsh context is not lost. A concern was raised in relation to translators being exposed potentially to very sensitive, confidential and distressing information, and how this aspect would be addressed.

The application of the Welsh Language (Wales) Measure 2011was seen as crucial to ensure that reports and other key materials such as training packages are also provided in Welsh, and to consider the working language of the Review Panel and the subject of the SUSR.

Question 17 - Please also explain how you believe the proposed policy could be formulated or changed so as to have 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 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.

The need was expressed to have timely access to translation services, as this could impact the timing of the delivery of the Review. In order to support the review it was suggested that there should be a pool of Reviewers who have the ability to communicate in Welsh.

Question 18 – 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:

Concerns were raised about the timeliness of the training for reviewers, chairs and panel members and the need for refresher courses in relation to the review process, and how this will be different to the training needs in England for domestic homicides. This was also linked to how the independence of Reviewers will be gauged, especially where they undertake a number of reviews in one region, which could result in an element of familiarity which could hinder learning.

The production of thematic reports for the Bi-annual Themed Dissemination Events was seen as a valuable learning tool, by providing updates on issues and themes and keeping staff informed. The Primary Learning aspect was seen as an opportunity, to halt and consider/clarify potential new learning within the review, which could negate the need to complete an extensive review, provide an opportunity for greater transparency and learning, and ensure the impacted family is at the heart of the review process.

Existing delays with feedback and sign off from the Home Office was raised as a concern. It was suggested that this could be addressed by having a Quality Assurance Panel for Wales based within Welsh Government, to ensure that the Welsh context is understood and responses made in a timely manner.

In terms of the document, it was suggested that some sentences were lengthy and should be simplified, and that a glossary of terms would enable more acronyms to be used which would help to condense the document. It was also suggested that the Co-ordination Hub could have a ‘Frequently Asked Questions’ page on their website to assist practitioners with the transition period.

A standard fee approach was raised for the commissioning of Reviewers to undertake a review. Respondents also requested more information in relation to the approved Chair/ Reviewers list, the availability of funding and the need to involve education when the subject of the review is under 18 years old.

Queries were also raised in relation to requests for multi-agency information from the coroner and how this should be addressed. Respondents also requested that the guidance gives detail on what will happen when a decision is made for the review not to be published or work is done to redact the document before publication.

Summary of Key Themes

The consultation process resulted in a number of key themes emerging. These themes are:

1. Capacity and funding
2. Victim and family voice
3. Training
4. Information sharing
5. Partnerships
6. Learning
7. Governance
8. Structure of guidance

These are outlined below in more detail.

1. **Capacity and Funding**: two key areas of concern arose regarding capacity; the capacity of Safeguarding Boards to undertake the additional work regarding Domestic and Offensive Weapon homicides and the capacity and availability of Chairs and Reviewers. This was also linked to the need for additional funding to help address these ongoing capacity issues. These issues were mentioned a total of 43 times across the responses to all of the questions[1].

   "Ability to get Chairs is an ongoing issue and must be addressed"

   "What financial help will there be to address capacity issues and how will you ensure that it is equitable?"

Welsh Government response:

Capacity is an existing issue which is compounded by the fact that single reviews are being undertaken. The SUSR process will mean that there will be fewer reviews undertaken within Wales as the need for multiple reviews on one case will now be encapsulated within a single review process. This should help address the existing capacity issues.

In addition, the establishment of a Chair and Reviewer list will help Safeguarding Boards to confidently employ those with the necessary skills and expertise. The SUSR team in collaboration with key stakeholders has also produced a paper for the Ministerial Board that looks at how compensation for undertaking these vital roles could be paid. This will help to attract key personnel to undertake the role, whilst also enabling Councils and other organisations to address internal capacity issues.

[1] For reference, there were 48 completed questionnaires to this consultation. Respondents were able to give their responses to 18 different questions as part of this consultation. This means that each of the 48 completed questionnaires are made up of 18 responses.

The Welsh Government has recognised that there will be an additional burden on the Safeguarding Boards and has therefore provided them with additional funding, to support the establishment of the SUSR process.

In addition, the SUSR Co-ordination Hub will be able to provide additional support in relation to sharing learning on a pan Wales basis, helping to identify those with the relevant expertise to undertake the various roles identified and monitoring the implementation of the recommendations and actions arising from Reviews.

2. **Victim and Family Voice:** it has been recognised in 18 responses that the SUSR process is attempting to put the victim and family at the heart of the process. However, 50 responses expressed concerns around how this will be achieved in practice. In addition, concerns were raised around the terminology used in relation to victims and principal individuals and the need for greater clarity.

   "…more could be done to keep the victim, family and community at the centre of the guidance, and there will need to be a streamlined narrative in support of this."

   "...there is no reference to victims of domestic abuse who often do not fall within the statutory definition of an 'adult at risk' so this may require some rewording if the statutory definition is what is implied here."

Welsh Government Response:

The guidance has been produced with third sector representatives and practitioners that work with victims and families, to ensure that lived experiences were considered and were central to the SUSR process. The SUSR team has also been working with the Victim and Family Refence Group to enable them to act as a critical friend to the process and to provide guidance on how the victim and family stay at the heart of the SUSR.

This will include the development of best practice guides on how to work with victims and families (including children and young people) in an inclusive manner. The Statutory Guidance will be amended to ensure that an initial victim needs assessment is undertaken to identify from the outset of the review the appropriate support services and advocacy arrangements required. Therefore Section 6 'Engagement of victims, family and principal individuals in the Single Unified Safeguarding Review process' within the guidance will be strengthened to reflect this and to provide greater clarity.

3. **Training**: concerns were raised regarding the need to initiate the training agenda as soon as possible, to ensure that once the SUSR is implemented practitioners/reviewers have the knowledge and understanding on how to take the process forward. Ongoing learning needs were also identified and how this would be implemented. These points were mentioned in 50 separate responses.

"What training will take place and when is there scope to do a shortened training session for grandparent rights?"

Welsh Government Response:

The Welsh Government has appointed Mid and West Wales Safeguarding Board to develop and implement a suite of training materials. This will include both in person and e-learning modules, which target Chairs, Reviewers and Review Panel members, to ensure that they meet the requirements within the key competency framework. It is proposed to implement the training during the transition period from November 2023 to March 2024. Training will then continue as part of a training programme linked to the SUSR Learning and Development Plan, which will include refresher sessions.

The Wales Safeguarding Repository will also have its own written and visual 'how to guide' to ensure that practitioners are able to search the repository for key learning.

4. **Information Sharing**: concerns were raised in 32 responses about the sharing of health information and whether or not the statutory guidance will address this issue.

   "Sharing of data is an ongoing issue, will be useful to see how this is addressed within the SUSR."

Welsh Government Response:

The SUSR team in partnership with 'Geldards LLP' has produced further clarity and guidance in relation to data sharing which will be incorporated within Section 9 'Sharing Information and Protecting Personal Data'. This will direct partners to the relevant legislation and lawful bases for how personal information can be processed for review purposes. In addition, the SUSR Coordination Hub will be working to provide further resources to assist review partners to navigate the information sharing process, and aid decision-making when determining which basis to use.

5. **Partnerships**: 45 responses recognised that the SUSR provides an opportunity to form stronger links and strengthen existing relationships between partnerships regarding safeguarding issues, particularly Public Service Boards and Community Safety Partnerships. However, they also recognised that this would require further work in practice.

   "How do we join up the connections between Community Safety and safeguarding?"

Welsh Government Response:

The guidance stipulates how and who is responsible for ensuring that partnership working is central to the SUSR process. This can be found in Sections 1 and 5 which highlight the need for the Co-ordination Hub and the Chairs of the Safeguarding Boards and Community Safety Partnerships to share review recommendations and actions with Public Service Boards and Regional Partnership Boards. This aspect will be strengthened further by removing the current reference to domestic homicides, in order that all relevant information is shared.

6. **Learning**: concerns were raised on how thematic learning from SUSRs will be shared more widely across Wales, which would also include the third sector and the Police, and who would be able to access the Wales Safeguarding Repository to obtain thematic learning.

   "Learning Lessons from past reviews is crucial as often the same issues arise…."

Welsh Government Response:

All practitioners (including relevant third sector organisations) will be able to request access to the Wales Safeguarding Repository. This access will be monitored and administered by the Co-ordination Hub to ensure that the repository is used appropriately, and that data protection rules are adhered to. The repository will also have its own written and visual 'how to guide' to ensure that practitioners are able to search the repository for key learning.

The Wales Safeguarding Repository will provide a unique opportunity for the Co-ordination Hub, practitioners and key partners to investigate a variety of evidence and examples, to obtain a balanced view on a particular theme or topic. This will then be used to help inform best practice, which will be shared pan Wales to help improve service delivery in relation to safeguarding issues. This insight into the safeguarding review landscape in Wales has not been possible before, and will help to target key learning opportunities, thus helping to develop a preventative approach to safeguarding, rather than a reactive one.

The Co-ordination Hub will play a pivotal role, by ensuring that learning developed through the WSR is shared both regionally and nationally with Safeguarding Boards and other key partners. The Co-ordination Hub will also have an oversight of all recommendations and actions, thus enabling effective monitoring and evaluation to take place. If actions are not being implemented it will highlight the reasons why and enable issues to be escalated to the Strategy Group and if necessary, the Ministerial Board.

7. **Governance:** 39 responses raised concerns about the governance structure and roles and responsibilities not being clear. It was felt that greater clarity was required in relation to the roles of the Ministerial Board, Strategy Group and the Operational Management Board.

"….is unhelpful when one tries to disentangle who is responsible to whom and for what"

Welsh Government Response:

The Terms of References for the SUSR governance structure are currently being amended to provide greater clarity on the roles and responsibilities. Hyperlinks to these will be provided within the final document. The text within the Statutory Guidance will also be amended to provide the clarity required, for example the Operational Management Board will be referred to as the Operational Management Team to reflect that this is a management function (for example, human resources, funding, technical aspects, and line management).

8. **Structure of Guidance:** concerns were raised about the structure and the repetitive nature of the guidance.

'Overall, we consider the document to be overly complicated'

Welsh Government Response:

The guidance by its very nature will be complicated as it is bringing together a number of legislative requirements. The structure has been developed using the 'Working Together' documents and Domestic Homicide Review Guidance to ensure consistency. The sections have been put in chronological order, but have been written so that they can be read in isolation which has resulted in elements of the text being repeated. Easy Read guides have also been produced to assist the reader.

However, a review of the text will be undertaken to ensure that it is as concise and readable as possible. The Easy Read guides and flow charts will also be reviewed as part of this process.

In addition, the training programmes which will be undertaken, will assist practitioners in their understanding of the Guidance.

Next Steps

The key next steps are to:

1. publish the consultation report findings on the Welsh Government consultation web page and to send a copy to all the responders and key stakeholders for information;

2. amend the Single Unified Safeguarding Review Statutory Guidance to take into account the comments received and to amend the Easy-to-Read guides accordingly; and review the Single Unified Safeguarding Review Integrated Impact Assessment;

3. use the feedback on consultation to inform the training programme and its delivery;

4. present the revised guidance and the paper on capacity issues to the November 2023 Ministerial Board for approval;

5. work with Safeguarding Boards and other key partners as part of a transitional period prior to publication of the Single Unified Safeguarding Review Statutory Guidance and full implementation in April 2024; and

6. revise the Single Unified Safeguarding Review and Wales Safeguarding Repository Delivery Plans to reflect comments received.

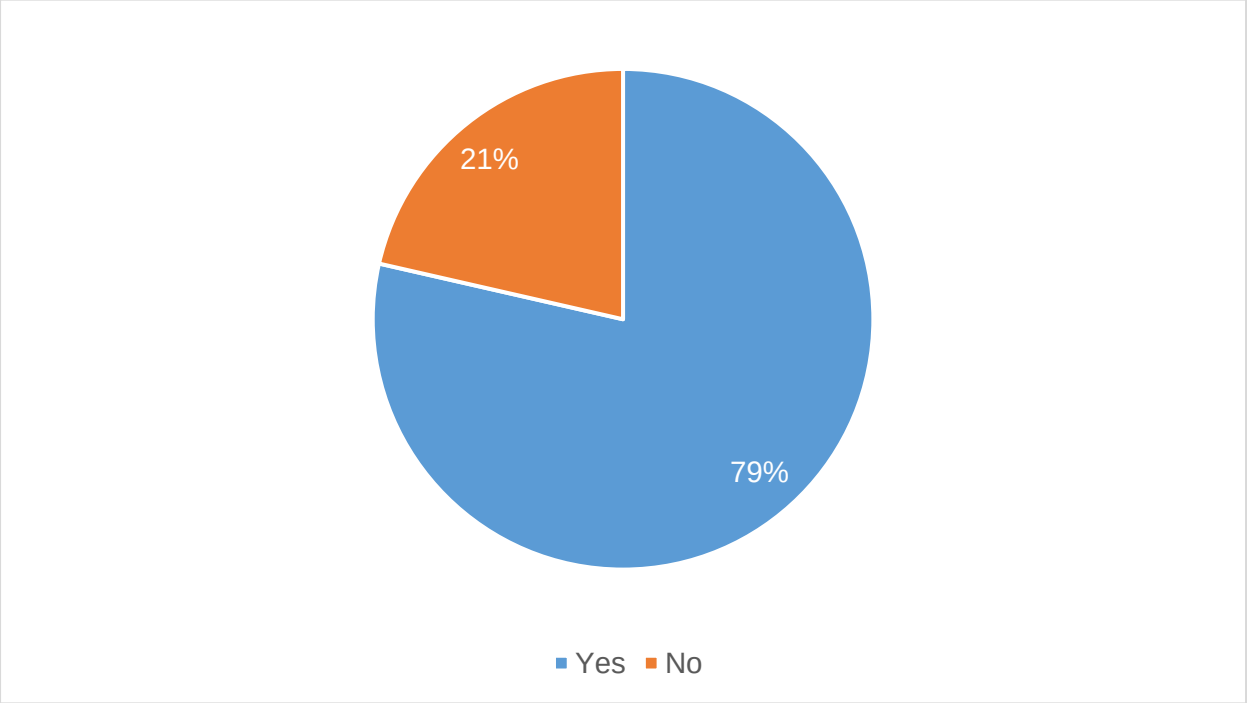
Appendix One

This annex includes graphs and charts which summarise the responses received to the Single Unified Safeguarding Review statutory guidance consultation.

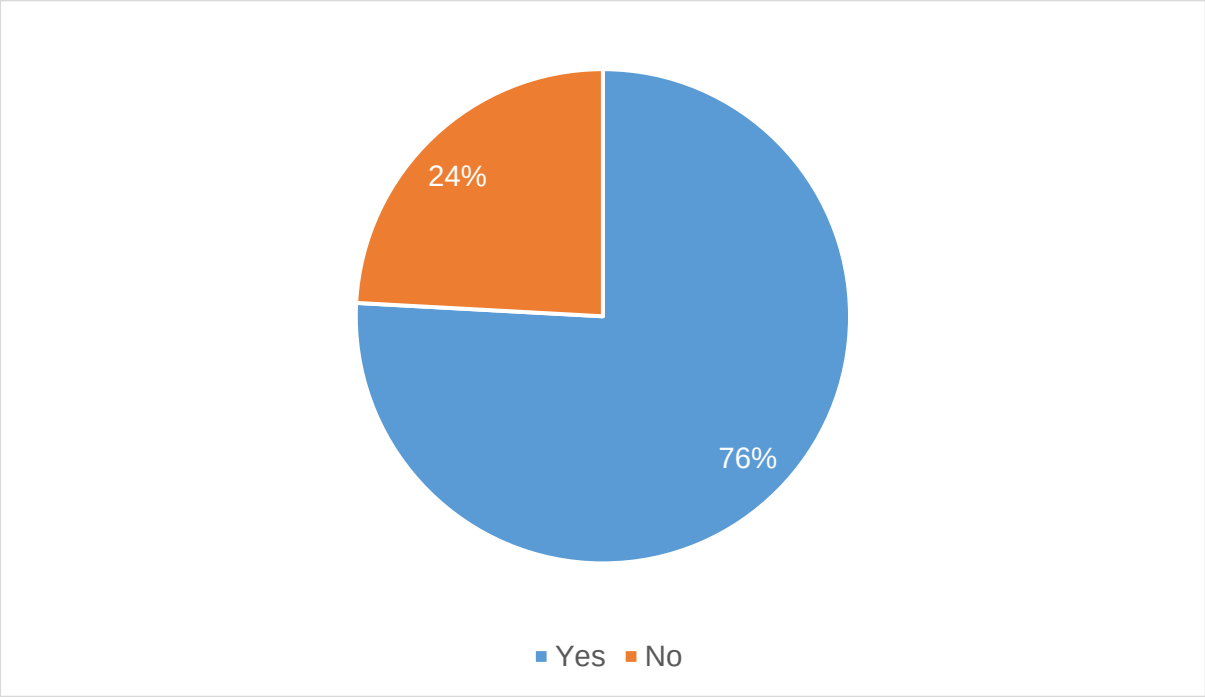
There were 48 completed questionnaires to the consultation in total. Some of the respondents did not give responses to all of the questions, hence why some of the graphs and charts do not include the full 48 responses. Some of the questions did not include a 'yes' or 'no' answer option and instead only included a free flow text box, this is why some of the questions do not have a corresponding graph or chart.

This section will include a chart for each of the consultation questions to show the percentages of respondents who responded either 'yes' or 'no' to the consultation questions. Respondents also included free flow text answers with their 'yes' or 'no' response which should be read alongside these graphs.

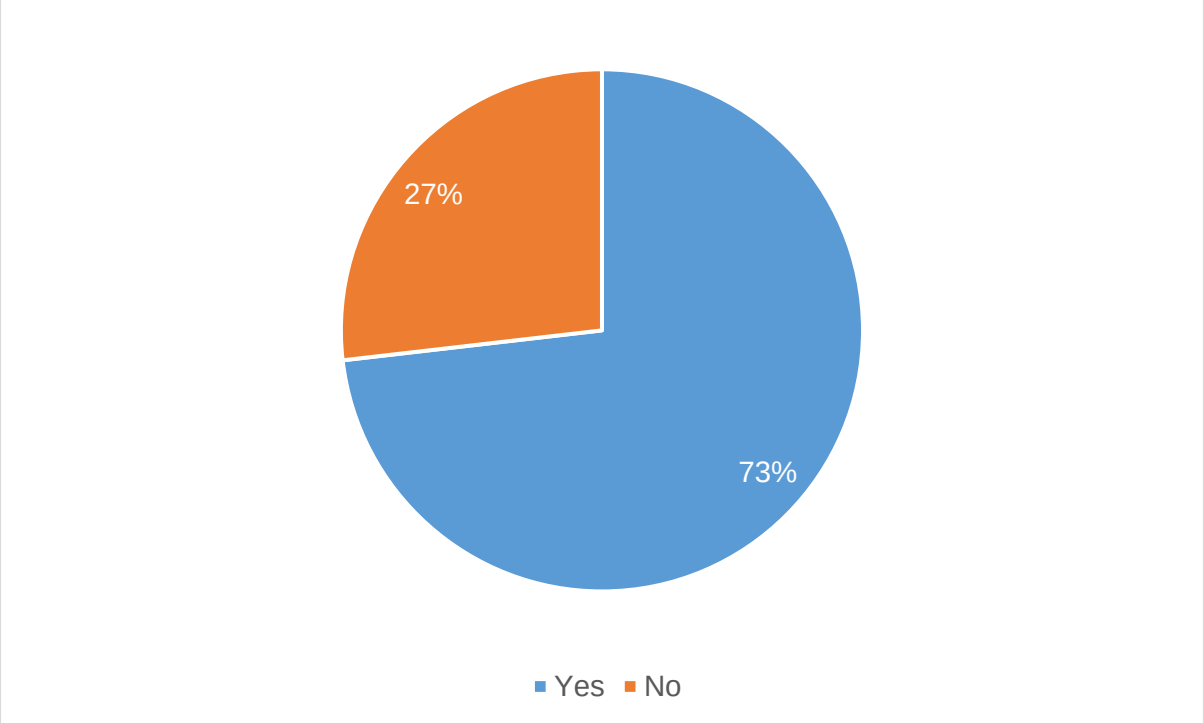
Question 1 - Does the Introduction provide clarity on the aims and reasons for producing the Single Unified Safeguarding Review process (SUSR)? Is the Introduction as set out in Section 1 clear and easy to understand?



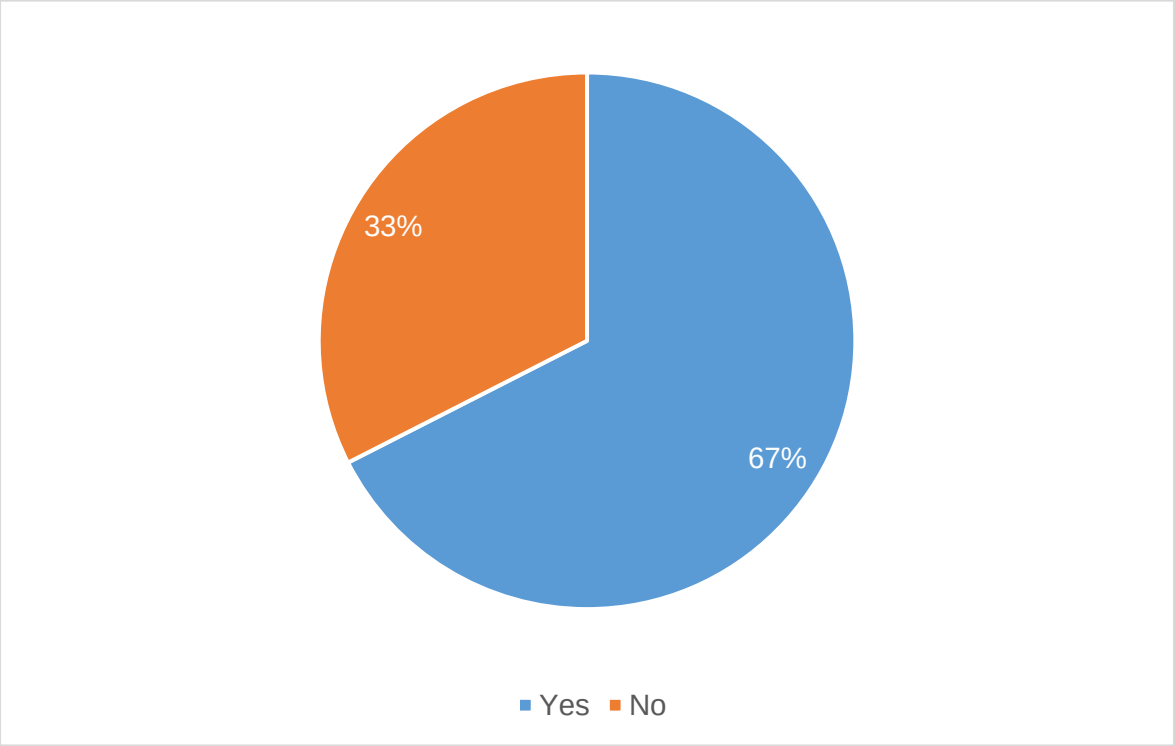
Question 2 - Do the Principles which underpin the SUSR set out in Section 2 achieve the desired outcome of a proactive approach to taking solutions forward and a positive shared learning culture which avoids multiple reviews of an incident, helping to reduce further trauma for victims and families?



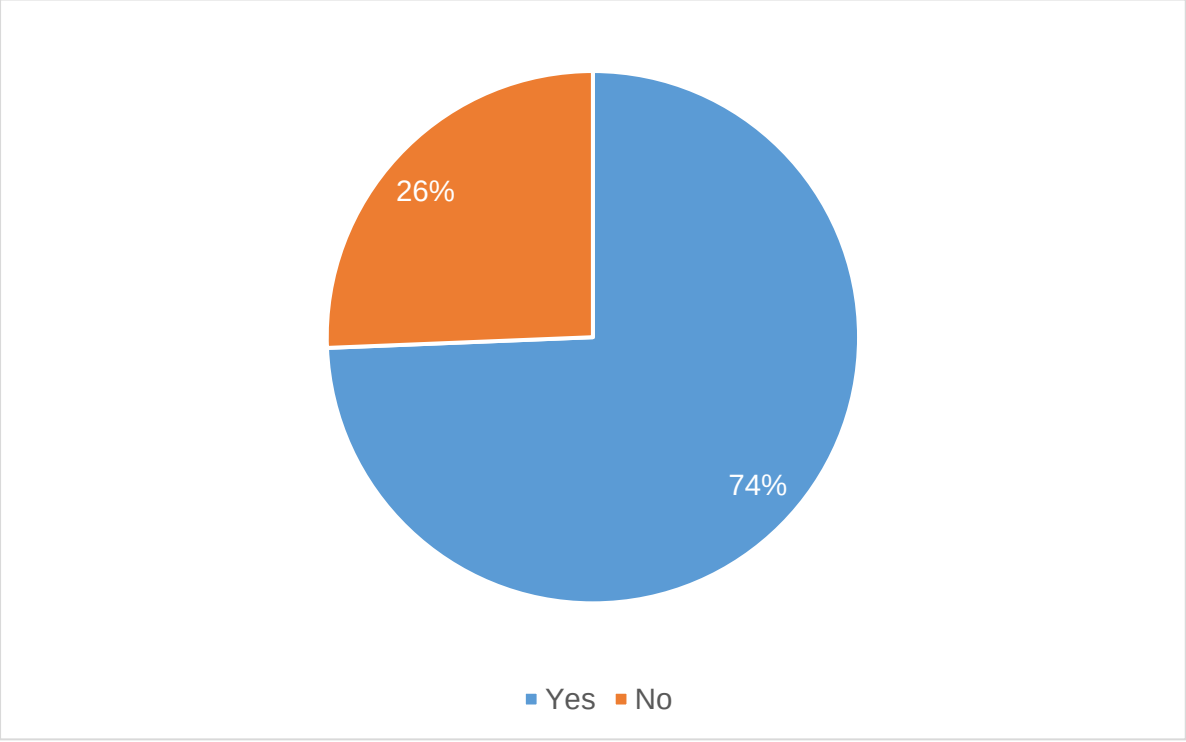
Question 3 - Does Section 3 provide the clarity required to determine when a SUSR should be undertaken and are the criteria clear and useful?



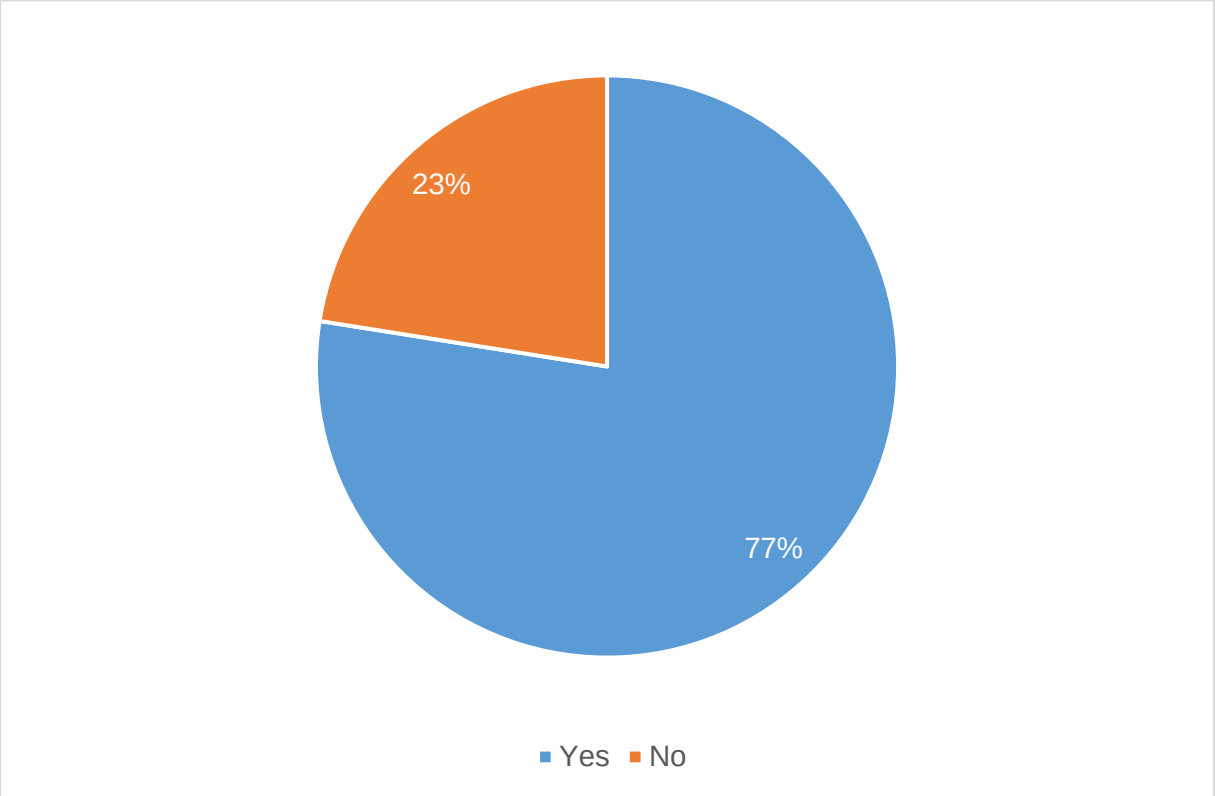
Question 4 - Does Section 4 provide clarity of the SUSR process and is there sufficient detail for each stage?



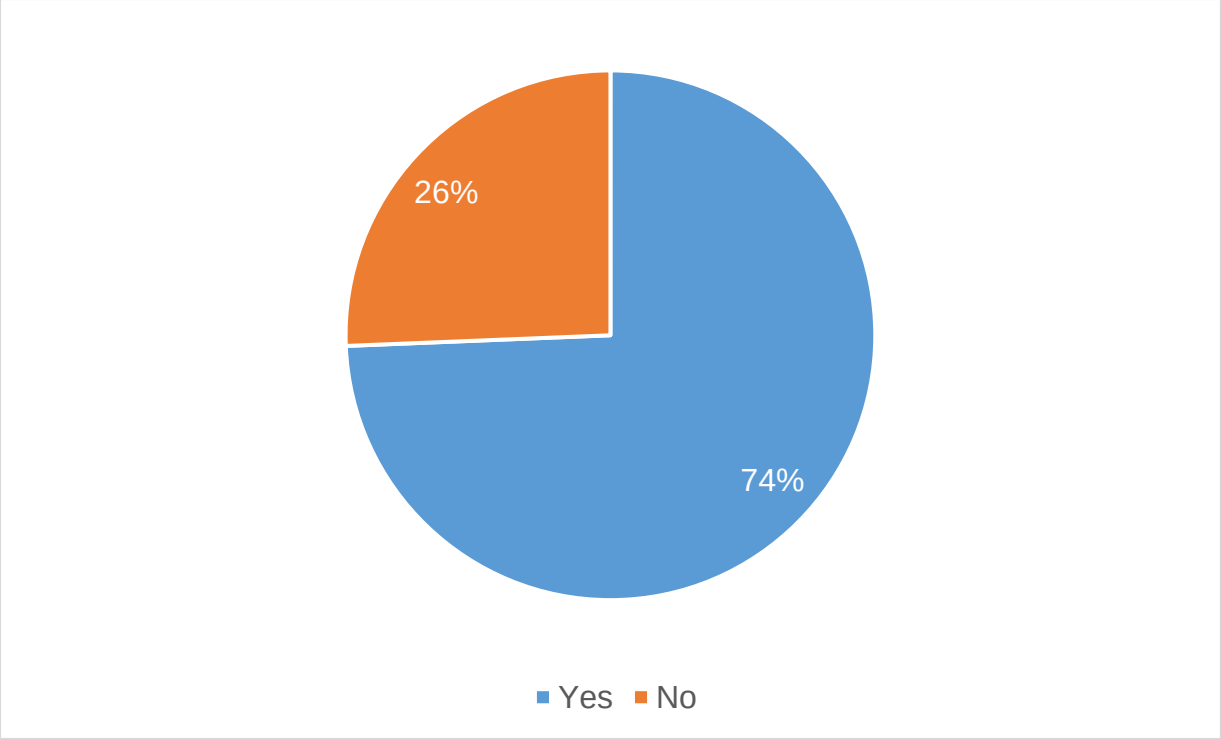
Question 5 - Are each of the Roles and Responsibilities as set out in Section 5 clear and useful?



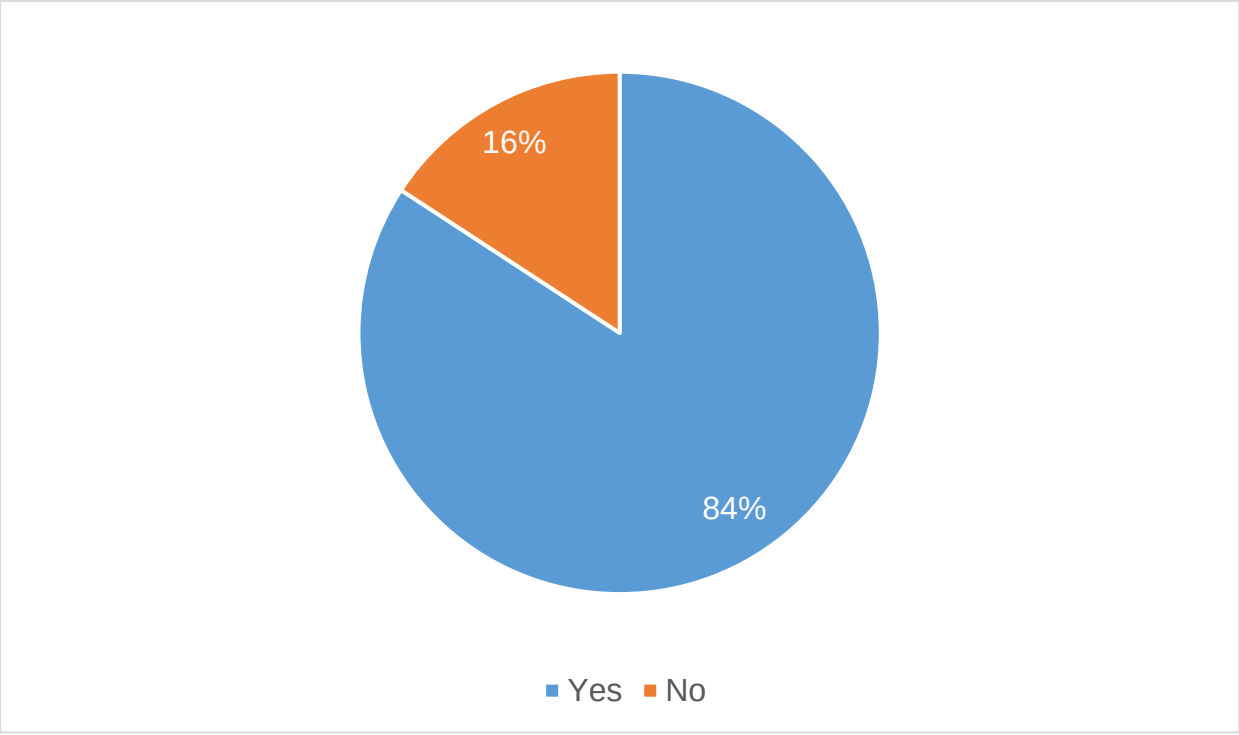
Question 6 - Do paragraphs 5.6-5.9 and appendix 3 of the guidance help Reviewer(s) to consider whether community partners (such as independent and third sector organisations) should be engaged in the SUSR process? If not, how could the guidance improve on this?



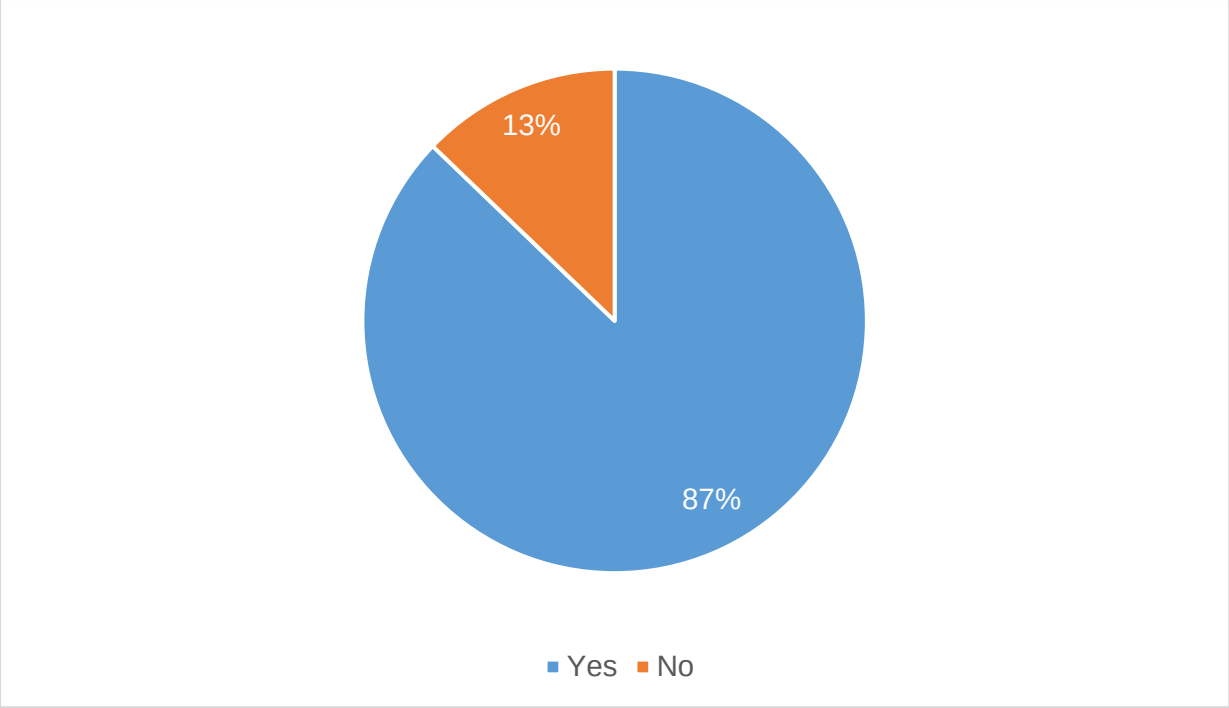
Question 9 - Are the guidelines for engagement with victims, families and principal individuals as set out in Section 6 clear and useful? Consider whether it is clear that the Reviewer(s) and Review Panel need to approach each participant in the review on a case-by-case basis and ensures that the victim, families and principal individuals are at the heart of the review process.



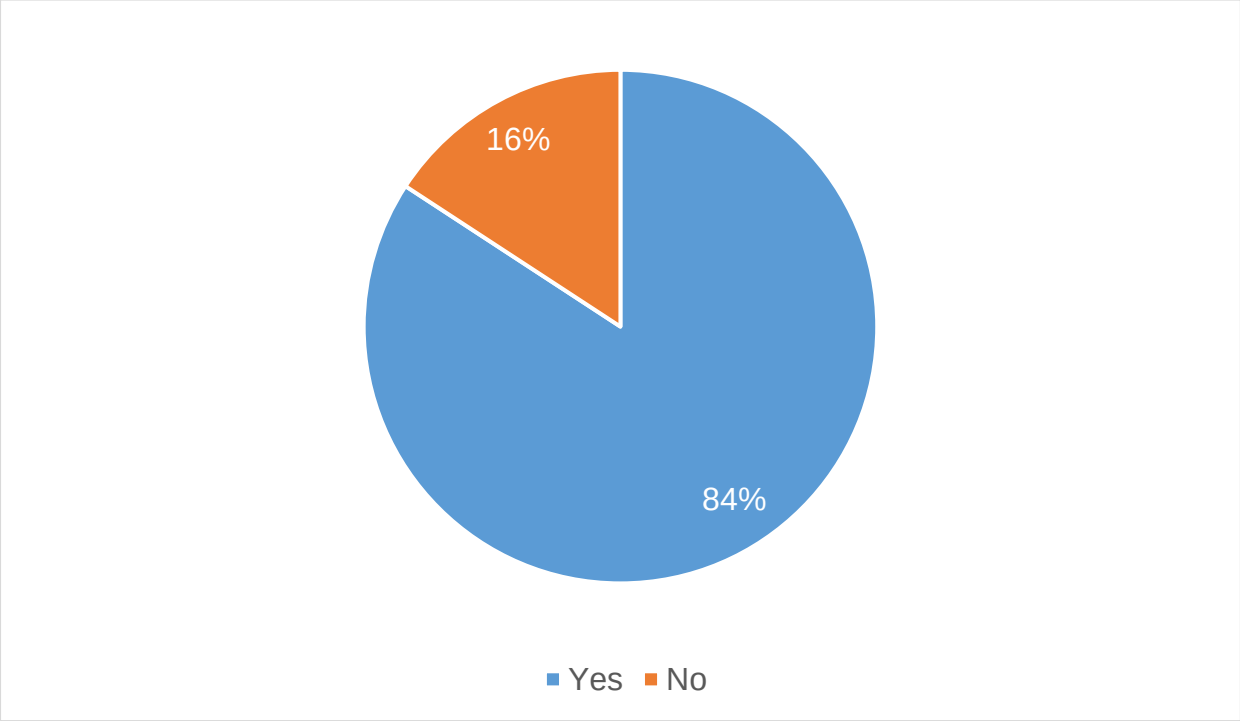
Question 10 - Section 7 outlines the number of stages which need to be undertaken as part of the review process. Are these stages in the appropriate chronological order and clear in terms of what is required?



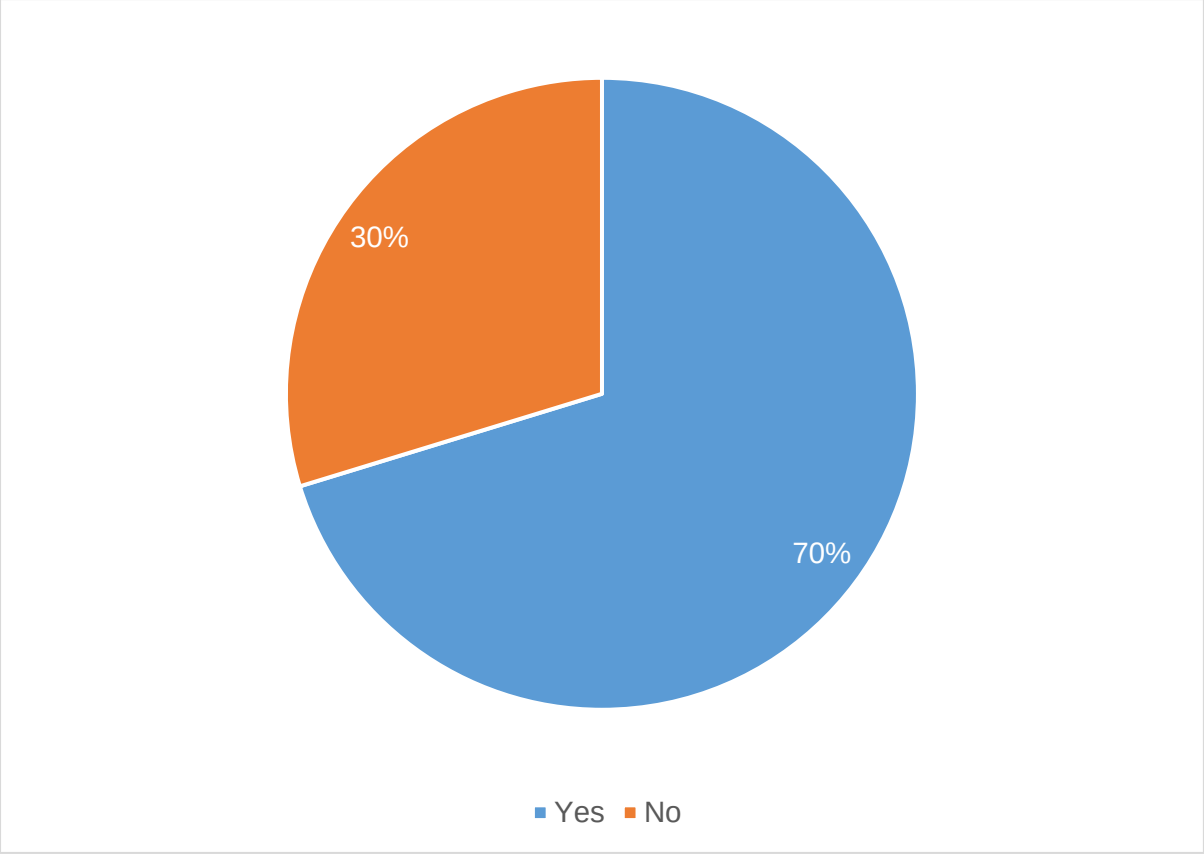
Question 11 - Does Section 8 ensure that learning is a key component of the SUSR process and a statutory obligation by providing clarity on how learning and information is shared as part of the wider process including working with relevant partnerships such as Community Safety Partnerships and Public Services Boards?



Question 12 - Does Section 9 set out the Data Protection considerations in a way that is clear and useful? Would you like to see a clear legal obligation in this section requiring review partners to share information for SUSR review purposes when requested, if one could be found?



Question 13 - Does the guidance provide sufficient clarity and flexibility to ensure that key partners including Community Safety Partnerships and Public Services Boards will be effectively engaged and involved within the SUSR process, where this is appropriate and helpful?



Appendix Two

This table includes information on who responded to the Single Unified Safeguarding Review statutory guidance consultation.

Reference No.	Online or Email Response	Anonymous	Name or Organisation
1	Online	Yes	
2	Online	Yes	
3	Online	No	Sian James
4	Online	Yes	
5	Online	Yes	
6	Online	Yes	
7	Online	Yes	
8	Online	No	Swansea Bay University Health Board
9	Online	Yes	
10	Online	No	North Wales Police
11	Online	Yes	
12	Online	No	Denbighshire Local Authority
13	Online	No	North Wales Safeguarding Board
14	Online	No	Cwm Taf Morgannwg Safeguarding Board
15	Online	Yes	
16	Online	No	Pobl Group
17	Online	No	Wales Safer Communities Network
18	Online	No	Gwent Safeguarding Board Regional Response
19	Online	Yes	
20	Online	No	Police Liaison Unit - Responding on behalf of Police and Crime Commissioners in Wales
21	Online	Yes	

22	Email	No	Stori
23	Email	No	Jan Williams. Independent member of the Home Office DHR QA Panel; Member of the SUSR Steering Group
24	Email	No	The Royal College of Paediatrics and Child Health
25	Email	No	Advocacy After Fatal Domestic Abuse (AAFDA)
26	Email	No	Mid and West Wales Safeguarding Board
27	Email	No	Public Health Wales
28	Email	No	Home Office
29	Email	No	Hywel Dda University Health Board
30	Email	Yes	
31	Email	No	Older People's Commissioner for Wales
32	Email	Does not indicate	
33	Email	No	Police & Crime Commissioner for South Wales
34	Email	No	Barnardo's Cymru
35	Email	No	Safeguarding Team, Welsh Ambulance Service NHS Trust
36	Email	No	Royal College of Psychiatrists
37	Email	No	Royal College of Nursing Wales
38	Email	No	WLGA
39	Email	No	The Office of the Children's Commissioner for Wales
40	Email	Does not indicate	
41	Email	No	Learning Disability Wales
42	Email	No	Office of the Police and Crime Commissioner for Dyfed-Powys

43	Email	No	West Glamorgan Safeguarding Board
44	Email	No	Age Cymru
45	Email	No	Cardiff and Vale Regional Safeguarding Board
46	Email	No	NSPCC Cymru
47	Email	Does not indicate	
48	Online - Easy Read	Yes	