

**Lynne Neagle AS/MS**  
Y Dirprwy Weinidog Iechyd Meddwl a Llesiant  
Deputy Minister for Mental Health & Wellbeing



Llywodraeth Cymru  
Welsh Government

Our ref: MA/LN/3305/23

Russell George MS  
Chair  
Health and Social Care Committee

[SeneddHealth@senedd.wales](mailto:SeneddHealth@senedd.wales)

26 January 2023

Dear Russell

Please find attached the December 2023 update to our response to *Connecting the dots: tackling mental health inequalities in Wales*.

Yours sincerely

A handwritten signature in black ink that reads "Lynne Neagle".

**Lynne Neagle AS/MS**  
Y Dirprwy Weinidog Iechyd Meddwl a Llesiant  
Deputy Minister for Mental Health and Wellbeing

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:  
0300 0604400

Bae Caerdydd • Cardiff Bay  
Caerdydd • Cardiff  
CF99 1SN

[Gohebiaeth.Lynne.Neagle@llyw.cymru](mailto:Gohebiaeth.Lynne.Neagle@llyw.cymru)  
[Correspondence.Lynne.Neagle@gov.wales](mailto:Correspondence.Lynne.Neagle@gov.wales)

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

**December 2023 update on response from the Welsh Government to the report by the Health & Social Care Committee entitled *Connecting the dots: tackling mental health inequalities in Wales***

Contents

<b>Recommendation 1</b> .....	2
<b>Recommendation 2</b> .....	4
<b>Recommendation 3</b> .....	7
<b>Recommendation 4</b> .....	8
<b>Recommendation 5</b> .....	9
<b>Recommendation 6</b> .....	12
<b>Recommendation 7</b> .....	15
<b>Recommendation 8</b> .....	17
<b>Recommendation 9</b> .....	19
<b>Recommendation 10</b> .....	21
<b>Recommendation 11</b> .....	22
<b>Recommendation 12</b> .....	24
<b>Recommendation 13</b> .....	25
<b>Recommendation 14</b> .....	26
<b>Recommendation 15</b> .....	27
<b>Recommendation 16</b> .....	28
<b>Recommendation 17</b> .....	29
<b>Recommendation 18</b> .....	29
<b>Recommendation 19</b> .....	31
<b>Recommendation 20</b> .....	33
<b>Recommendation 21</b> .....	33
<b>Recommendation 22</b> .....	35
<b>Recommendation 23</b> .....	36
<b>Recommendation 24</b> .....	37
<b>Recommendation 25</b> .....	38
<b>Recommendation 26</b> .....	40
<b>Recommendation 27</b> .....	42

## Recommendation 1

*The Committee recommends that*

*The mental health and wellbeing of the population will not improve, and in fact may continue to deteriorate, unless effective action is taken to recognise and address the impact of trauma, and tackle inequalities in society and the wider causes of poor mental health. This message, combined with a clear ambition to reduce mental health inequalities, must be at the centre of Welsh Government's new mental health strategy.*

### **Original response: Accept**

The current Together for Mental Health Strategy 2019-2022 is cross-Government, multi-agency and includes a specific focus on supporting vulnerable groups and reducing inequalities.

A fundamental principle of the successor strategy will be reducing mental health inequalities.

### **December 2023 update:**

The new (draft) Mental Health and Wellbeing Strategy for Wales (2024-2034) is due to be published shortly for public consultation. The strategy sets out four vision statements, one of which is specifically focussed on cross-Government action to protect good mental health and wellbeing. Here, we have identified the work that is being prioritised across Government that will have a positive impact on the mental health and wellbeing of people living in Wales.

Furthermore, the strategy and the four vision statements are underpinned by several core principles, which include:

- taking a rights-based approach (respecting, protecting and fulfilling the rights of individuals in the care they receive);
- being trauma-informed (making use of the Trauma-Informed Wales Framework<sup>1</sup> to help everyone in Wales understand how trauma and adversity can impact people and their role in supporting those affected by trauma);
- and focussing on equity of access, experience and outcomes without discrimination, and ensuring services and support are accessible and appropriate for all.

By understanding the barriers people face and putting necessary systems in place, when people reach out for support there is equity in experiences and outcomes. To achieve this, support and services will need to be culturally and age appropriate, as well as meet the needs of Welsh speakers, ethnic minority people, LGBTQ+ communities, people with sensory loss, neurodivergent people and people who are experiencing poverty.

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<sup>1</sup> [Trauma-Informed Wales Framework \(https://traumaframeworkcymru.com/\)](https://traumaframeworkcymru.com/)

Some actions in the draft strategy will also support a focus on promoting equity, including a commitment to develop quality statements for mental health that set the standards for what health boards and local authorities are expected to deliver to ensure good quality mental health services. These quality statements will support a person-centred approach and enable equitable access to services for those with protected characteristics (as described in the Equality Act 2010) and preferred language.

## Recommendation 2

*The Committee recommends that*

*Ideally in its response to our report, but at latest by July 2023, the Welsh Government should provide a frank appraisal of which policy, legislative and financial levers for tackling poverty and other social determinants of mental health are held by the Welsh Government, and which are within the control of the UK Government. This appraisal should be accompanied by a realistic assessment of how far the Welsh Government can go in improving the mental health and wellbeing of the population using the levers within the Welsh Government's control, and information about how the Welsh and UK Governments are working together to ensure the levers at the UK Government's disposal are used to best effect to improve mental health and wellbeing in Wales.*

### Original response: Accept in principle

The current strategy is cross Government and is underpinned by a cross Government senior officials' group. Our future mental health strategy will set out how we intend to further improve the mental health and wellbeing of the population. Part of any future strategy will be a focus on understanding measures that can support our desire to achieve improvement on Well-being of Future Generations (Wales) Act 2015 Well-being Indicator 29: Mean mental well-being score. This will focus on population-wide measures to improve and support mental wellbeing and understanding the levers the Welsh Government has to improve that will form part of that work.

It is widely acknowledged that the levers the Welsh Government has to tackle poverty are limited. To substantially reduce poverty levels would require a radical change in the approach taken by the UK Government. The last three years have been unlike any we have had to navigate since devolution.

In line with the broad aims for contributing to the eradication of child poverty in the Children and Families (Wales) Measure 2010, we have continually prioritised and made significant investments in a range of policies and programmes to promote prosperity and prevent and mitigate poverty. Despite this, it remains a pervasive issue and our best efforts have been hindered by decisions taken by the UK Government.

Although the key levers for tackling poverty – e.g. powers over the tax and welfare system – sit with the UK Government, our priority as a Welsh Government remains to protect the people of Wales and to help them through the cost-of-living crisis, while striving to secure a stronger, fairer and greener Wales. Given the effects of the pandemic and the cost of living crisis, the most recent Welsh Government actions on poverty have focussed on mitigating the immediate impact of poverty. This year alone (2022/23) we are spending more than £1.6bn on schemes that target the cost-of-living crisis and on programmes that put money back in people's pockets. Wales Centre for Public Policy (WCPP) report 'Poverty and Social Exclusion a Way Forward'<sup>2</sup>, published in September 2022, sets out the conclusions of a Welsh

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<sup>2</sup> [Poverty and social exclusion: A Way Forward by Dan Bristow, Anna Skeels, Manon Roberts & Isabelle Carter Published September 2022](#)

Government commissioned review. This includes Mental Load and Mental Health – Addressing the emotional and psychological burden carried by people living in poverty and social exclusion through tackling stigma, (re)humanising ‘the system’ and treating people with the respect and dignity they deserve. These findings will be taken into consideration as we take forward our commitment to a whole government approach to tackling poverty and inequality and the delivery of Programme for Government commitments through a poverty lens, to meet current need and achieve longer term change.

During 2023, we are involving a wide range of stakeholders, including children and young people, families and communities and the organisations that work with them in a two-phased approach to the development of a co-constructed revised Child Poverty Strategy for Wales. Importantly, this work includes targeted engagement with those with protected characteristics and the organisations that work with them.

#### **December 2023 update:**

The new (draft) Mental Health and Wellbeing Strategy for Wales (2024-2034) sets out the policy levers available to ensure people have the knowledge, confidence and opportunities to improve their mental health and wellbeing.

- Vision Statement 1: there is cross-Government action to protect good mental health and wellbeing.
- Vision Statement 2: there is a connected system where all people will receive the appropriate level of support wherever they reach out for help.
- Vision Statement 3: there are seamless mental health pathways, which are person-centred, needs-led and where people are guided to the right support first time, without delay.
- Vision Statement 4: we are proposing to use existing National Indicators to measure cross-Government progress and have also committed to exploring a range of data that will enable us to measure success.

Wider developments are also relevant to this recommendation – including work being taken forward by Public Health Wales and the Wider Determinants of Health Unit. Working in partnership with health board Executive Directors of Public Health, Welsh Government and the Future Generations Commissioner's Office, the unit is leading on delivering a multi-year programme which aims to support Public Services Boards in Wales to apply theory and evidence-informed systems approaches to influencing the wider determinants of health.

During 2022-23 and 2023-24, support to mitigate the impact of the cost of living crisis was worth more than £3.3bn. This includes targeted support for disadvantaged households in Wales to alleviate financial pressures, action to maximise incomes and initiatives which help deliver the social wage in Wales, keeping money in people's pockets.

We continue to take forward our commitment to a whole government approach to tackling poverty and inequality and the delivery of Programme for Government commitments through a poverty lens, to meet current need and achieve longer term change.

During 2023, we involved a wide range of stakeholders, including children and young people, families and communities and the organisations who work with them in the development of the co-constructed revised Child Poverty Strategy for Wales. The work included targeted engagement with those with protected characteristics and organisations who work with them.

In the shorter term, the findings of the Wales Centre for Public Policy (WCPP) report 'Poverty and Social Exclusion a Way Forward'<sup>3</sup>, have informed initiatives such as the development of the Charter for the Delivery of Welsh Benefits which includes a set of principles that will underpin the delivery of a coherent and compassionate Welsh benefits system.

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<sup>3</sup> [\*Poverty and social exclusion: A Way Forward\* by Dan Bristow, Anna Skeels, Manon Roberts & Isabelle Carter  
Published September 2022](#)

**Recommendation 3**

*The Committee recommends that*

*By December 2023 the Welsh Government should have commissioned an independent review of the existing evidence, and such further research as may be necessary, to explore the impact of the UK welfare system on mental health and wellbeing in Wales, and what effect the devolution of welfare and/or the administration of welfare could have on tackling physical and mental health inequalities in Wales. The review and research should take into account issues of principle, as well as the practicalities and associated financial implications of retaining the current situation or any further devolution. The Welsh Government should commit to publishing the outcome of the review and research.*

**Original response: Accept in Principle**

The importance of undertaking research into how interaction with the UK social security system impacts on mental health and wellbeing is acknowledged. Since 2013 there have been a variety of studies in this field, particularly on the mental health impacts that are generated by benefit sanctions and through the assessment processes that are used to determine eligibility for disability and incapacity benefits. Work is also being progressed in connection with the Co-operation Agreement to explore the necessary infrastructure required to prepare for the devolution of the administration of welfare.

Health and Social Services research team will collaborate with relevant policy colleagues to explore the need for additional research, determine how long the research would take and how it fits with other priorities and commitments.

**December 2023 update:**

Library research on the impacts of the UK social security system on claimants' mental health has been completed and a significant amount of research has been undertaken in this area. The research covers a wide range of aspects of the UK benefits system, including the assessment process for disability benefits, Universal Credit conditionality regime, benefit sanctions and approaches that enhance claimants' mental health.

The Welsh Government is commissioning independent research on the 'administration of welfare'. The outcomes from this research will identify the positive outcomes that could be achieved for people in Wales if administration powers were devolved. It is anticipated that the research will be completed in July 2024.



#### **Recommendation 4**

*The Committee recommends that*

*The Welsh Government should set out how the new mental health strategy will ensure that people with severe and enduring mental illness will have routine access to physical health checks, and what actions will be taken to minimise the impact of factors such as poverty, disadvantage and diagnostic overshadowing on this group.*

#### **Original response: Accept**

The core contract for GPs as part of unified services requires GPs to record information about people with serious mental illness and have a record of high blood pressure and other physical health conditions / risks.

As part of the work to support the development of the successor to *Together for Mental Health*, we have already commissioned work to inform our approach to improve the physical health of individuals with mental health issues.

The National Collaborative Commissioning Unit, working in partnership with the Royal College of Psychiatrists, is undertaking a systematic review of the current approach and best practice to support optimum physical health in mental health services.

The current *Together for Mental Health Strategy* is cross-Government, and this is supported by a cross-Government Senior Officials Group. The Group represents the key policy areas that are protective of good mental health, for instance Tackling Poverty, Employment, Housing and Education. We will be working with this Group to inform the cross-Government approach in the successor plan.

We will also be working with the NHS and wider partners to strengthen the existing approach to Care and Treatment Planning which already includes consideration of outcomes across key life areas including finance, housing, work and family. One of the aims of the successor strategy to *Together for Mental Health* is to improve the diagnosis and effects of physical ill health and prevention of diagnostic overshadowing will be included as part of this work.

The approach to each of the elements of this recommendation will be included in the consultation on the successor to *Together for Mental Health* at the end of 2023.

#### **December 2023 update:**

Vision Statement 4 of the new (draft) Mental Health and Wellbeing Strategy for Wales (2024-2034) specifically recognises that people who have a severe and enduring mental health conditions experience worse health outcomes. In the draft we commit to taking action to address this over the life of the new strategy and we are proposing to ensure people living with long term mental health conditions are supported in having their physical health needs met. We also commit to establish a new cluster-based specification to improve the physical health of people with severe and enduring mental health conditions, supported by clear data. This will focus on our ambition to reduce the mortality gap between people who have severe and enduring mental health conditions and those who do not.

## Recommendation 5

*The Committee recommends that*

*The Welsh Government should, in line with the recommendation from our advisory group, publish a roadmap setting out clear actions at national and local level to improve mental health among neurodivergent people. This should be published by July 2023 and include actions to simplify and make more accessible the process for adults and children to be assessed/diagnosed for neurodivergent conditions.*

### **Original response: Accept**

A demand and capacity review of all neurodevelopmental condition services was completed in March 2022. In response, in a Written Statement of 6 July the Deputy Minister for Social Services announced a neurodivergence improvement programme backed by £12m of additional funding. The programme has commenced; an initial £1.4 million has been allocated to Regional Partnership Boards to meet urgent need. The programme has three workstreams, the first, considering early help and support, the second, developing sustainable neurodevelopmental services and the third to ensure cross cutting priorities including data and workforce are progressed. Support for neurodivergent people with co-existing conditions including meeting mental health needs will be developed as a priority area within the programme.

The programme will align with the NEST/NYTH framework for children and young people's well-being and will take a whole system approach to developing services. To oversee this work, we have established a Ministerial Neurodivergence Advisory Group, which is co-chaired by individuals who have lived experience of neurodivergence.

In November we undertook a series of public engagement events across Wales to discuss the programme's priorities and seek stakeholder views. The feedback received was positive and was summed up in a bilingual summary report<sup>4</sup>.

### **December 2023 update:**

We continue to engage directly with our stakeholders to present our plans for improvement and provide regular updates as progress is made. Our National Neurodivergence Advisory Group is providing us with expert advice on delivery. We also published a newsletter in July; a second will be published shortly.

The Neurodivergence Improvement Programme commenced in July 2022 and is currently funded up to March 2025. Improvements continue to be developed through two main workstreams focussing on the priorities for action identified in the demand and capacity review and endorsed by stakeholders.

Underneath the workstreams, alongside our Clinical Advisory Group we have now established several working groups with specific focus to drive forward transformational change. These include an Adult ADHD Pathway Group, Children's Neurodevelopmental Leads Steering Group and Children's Neurodevelopmental Community of Practice.

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<sup>4</sup> [Neurodivergence improvement programme: engagement events November 2022 | GOV.WALES](#)

The improvement programme is an evolving and learning programme. We have built a solid foundation on which to take forward transformational change.

We re-iterate that while we all want to see better services as quickly as possible, it takes time and energy to work in co-production with neurodivergent people to develop and test the services they want to see, and we are confident that the programme will deliver the outcomes needed.

This year we have invested £4.5m to bring capacity to existing services, to scope gaps and to test out innovative ways of working. We have worked closely with Regional Partnership Boards to ensure their work aligns to the principles and intended outcomes of the Neurodivergence Improvement. We are currently engaging with Regional Partnership Boards to review progress and understand any barriers to implementation.

In 2024 we are making a further £6m available to embed improvements and develop long term service improvement.

The ND improvement programme has a dedicated clinical advisory group. They are currently exploring options for a high level, national pathway for neurodivergence services.

The NHS Executive Performance & Assurance Team (previously the Delivery Unit) have been working directly with health boards to review the assessment process, to understand the flow through the services and to identify barriers to improvement which can be addressed through the programme workstreams. They will conclude their work early in the new year. The outcomes of this work will provide the focus of work for children's neurodevelopmental services in 2024-25.

We are taking a whole system approach to improving services, aligned to the NEST/NYTH model for children and young people. We are taking a needs-based and social model approach to improvement. In a previous meeting of the Ministerial Advisory Group members invited Autistic UK to give a presentation on the social model of disability which was well received.

The National Neurodivergence Team (NNT) (previously the National Autism Team) have established a very successful Neurodivergence Community of Practice for ALN Co-ordinators (ALNCo's). This has been well received and well attended. Topics covered include 'Supporting Neurodiversity in the classroom'. All sessions are recorded and publicly available on their website [AutismWales.org](https://www.autismwales.org).

Through our workstreams and working groups we continue to set out a strong vision for the improvement of neurodivergence services, including the provision of early intervention regardless of diagnosis and post diagnostic support. The following diagram illustrates our vision and has been widely shared across the workstreams:

## Neurodivergence Improvement Programme



## **Recommendation 6**

*The Committee recommends that*

*In its response to our report, the Welsh Government should provide assurance that work to develop cross-cutting early support for children and young people who may be neurodivergent, and their families, before they receive a formal diagnosis will be progressed with pace and urgency. This should include setting out what specific actions will be taken and when, and details of when and how evaluation will be undertaken to assess whether people's experiences and outcomes are improving. Consideration should be given to the use of peer support approaches, video buddies and neurodivergent champions.*

### **Original response: Accept**

As above, in addition we have commissioned the NHS Delivery Unit to undertake a review of existing ND assessment services and to make recommendations on where improvements can be achieved. The Delivery Unit will also develop an assurance framework to measure the impact of changes in services and support as they are developed.

### **December 2023 update:**

The six-month pilot of the Listening Line has now concluded. This was an invaluable learning opportunity. It has become evident that many neurodivergent people and their families require more support than a listening line can offer. There is a need for information, more expert advice and referral on to local services outside of core working hours. The outcomes of this review have been discussed with our Ministerial Advisory Group and the Deputy Minister for Social Services. A working group will now be established to scope out options for the potential of a helpline pilot.

The NHS Executive Performance & Assurance Team (previously the Delivery Unit) is concluding its work with health board children and young people's ND services. In the new year each health board will have signed off a set of recommendations that they will need to action. The NHS Exec will then provide us with a national picture identifying strengths and any barriers to delivery. This will be shared and discussed with the leads of children's neurodevelopmental services in the new year.

Cross-cutting early intervention for children, young people and their families is a key priority. In particular, we are clearly aligning the Neurodivergence Improvement Programme with the implementation of the NEST/NYTH framework. Further work is required, and a commitment to this is made in the forthcoming NEST/NYTH annual report.

As well as the good practice already identified, such as the Single Point of Access panels for all children's referrals, there is also emerging innovative practice of early intervention in many areas in Wales. For example, Hywel Dda University Health Board's (HDUHB) children's neurodevelopmental services are offering advice and consultation sessions to families prior to referral, learning from the experiences of the Integrated Autism Service; Cwm Taf Morgannwg University Health Board (CTMUHB) has committed to piloting Neurodivergence Community Connectors to link families in with early help and post diagnostic support; North Wales sought to

appoint additional clinical staff in their children's neurodevelopmental service to begin to build capacity to provide pre-diagnosis support.

Following the first phase of the evaluation of the impact of the Autism Code of Practice, recommendations have been made to each local authority area to improve access to information, advice and assistance through their first point of contact or Information, Advice and Assistance Services.

Key to the successful delivery of early support is the upskilling of services from which families often receive support. We have met with Families First Leads and agreed next steps. This includes engagement with the National Neurodivergence Team to train and upskill the Families First workforce, including the development of bespoke training if deemed necessary. The National Neurodivergence Team will also be working with the national Family Information Service to increase their awareness of neurodivergence.

In their recent first face to face meeting in October, our Ministerial Advisory Group provided a helpful insight into what a 'good model of neurodivergence services' should look like. This includes the need for peer led services, community neurodivergent champions, and upskilling of local services.

Many Regional Partnership Boards are transitioning their Regional Autism Strategic Group to Regional Neurodivergence Strategic Groups. These include Swansea Bay University Health Board (SBUHB) and CTMUHB. These areas are widening the representation of stakeholders on this strategic group to begin to address wider issues such as early support. Strong examples of this are the recent neurodivergence 'Hackathon' held by CTMUHB, and the recent SBUHB strategic group acknowledgement that all partners have a part to play in supporting families awaiting diagnosis. (This was provided by the chair - Head of Children's Services).

Improvement Cymru have recently provided Outcome Measures Training to support a culture shift across all neurodivergence services. The training was well attended and benefited from rich learning across Integrated Autism Service, CAMHS, children's neurodevelopmental services and emerging adult ADHD services. Improvement Cymru host a useful website containing these materials which is accessible to all services as a follow up to support implementation into practice.

There is a national roll-out programme across the NHS to better understand people's experiences of services and to use this information to support further improvement. We are engaging with this programme to ensure the needs of the neurodivergent community are understood within the development of these ten core questions or 'Patient Reported Experience Measures'.

Through all of our workstreams and engagement with Regional Partnerships Boards, we are giving a clear message that service improvement needs to be based on evidence, including data and qualitative information from people's experiences and outcomes.

Through the Improvement Programme we are working with regions to pilot different projects, which if successful can be showcased with a potential to scale up to a national model. Cardiff and Vale University Health Board (CVUHB) is working with us, piloting a 'dashboard' approach which will provide an overview of the progress across adult and children's neurodevelopmental services. This is an initial draft with high level reporting information from existing services such as the IAS and innovative projects funded by the improvement programme.

An example of the detail collected by CVUHB is from their Early Years Pathfinder Project which is piloting a community connecting approach to families with children on, or being referred to, the ND waiting list. The project provides information, advice and support to access local services which can provide early help for families. Although only a small pilot in its infancy, the project can report on its first round of evaluation which has found that 88% of people reported a better awareness of available support after the connection sessions.

We are working with adult ADHD services to explore an initial minimum viable data set and what current systems enable them to report on. Many health boards such as Aneurin Bevan, Cwm Taf, Powys and Hywel Dda have made a clear commitment to develop robust data collection processes.

We are currently researching and exploring work from across the UK which includes an innovative approach from Portsmouth. The Portsmouth Neurodiversity Profiling Tool enables identification of a child's need, matches it with interventions that parents and schools can implement as early intervention. This approach was co-produced with parents and carers in conjunction with Portsmouth University and the local neurodevelopmental team. The local neurodevelopmental team supports this work by providing advice and consultation to families without a diagnosis, host education liaison posts within their teams, and accept the profile as a referral should the child need to go on to explore a possible diagnosis. We have already met with Portsmouth ND team, and we will be asking them to share their work in our next Community of Practice. There is already interest from several health boards in a potential Welsh local pilot of this work.

## Recommendation 7

*The Committee recommends that*

*In its response to our report, the Welsh Government should set out a clear timeline for the urgent review of mental health provision for deaf people and commit to providing us with an update on the review, and any conclusions or emerging findings, by July 2023. It should also provide assurances that the review will take account of the issues raised by the All Wales Deaf Mental Health and Well-Being Group in its report, *Deaf People Wales: Hidden Inequality*, and consider whether the establishment of a national specialist deaf mental health service for Wales is required.*

### **Original response: Accept**

We will review mental health provision for deaf people and in doing so take account of the issues in the *Deaf People Wales: Hidden Inequality* report, although this will be part of work that will look at sensory loss more broadly. A fundamental aim of our work to develop the successor to *Together for Mental Health* will be to reduce inequalities in access and outcomes for **all** groups where there is a barrier to accessing support. This will include actions to ensure services meet the all-Wales standards for communication and information, but also language and other protected characteristics. The aim will be to remove barriers to support for each cohort and we will be looking at the evidence around sensory loss more broadly to inform the future plan.

We will do early scoping work by July 2023 but as this will be part of the work of our successor to *Together for Mental Health* this work will be ongoing throughout 2023 and will form part of our draft mental health strategy which will go out to formal consultation at the end of the calendar year.

### **December 2023 update:**

As highlighted in relation to Recommendation 1, we are proposing that the new (draft) Mental Health and Wellbeing Strategy (2024-2034) is underpinned by the principle of equity of access, experience and outcomes without discrimination, and ensuring services and support are accessible and appropriate for all. We are proposing specific actions to support this agenda within the draft strategy, including commitments to:

- Continue to promote the Active Offer and the All-Wales Standard for Accessible Communication and Information for People with Sensory Loss (and the Accessible Information Standard Requirements) across all services, in line with the principles set out in *More Than Just Words*, and duties under the Equality Act 2010.
- Develop quality statements for mental health that set the standards for what health boards and local authorities are expected to deliver to ensure good quality mental health services. These quality statements will support a person-centred approach and enable equitable access to services for those with protected characteristics (as described in the Equality Act 2010) and preferred language.



There will be further detail on how this work will be progressed within the delivery plan which will accompany the final plan, which will be informed by the ongoing review of mental health provision for deaf people. Some specific work that is ongoing is in relation to developing BSL translation for deaf people contacting 111 press 2 to ensure equity of access. We will also deliver deaf cultural awareness training to staff within 111 press 2 in 2024.

## **Recommendation 8**

*The Committee recommends that*

*In its response to our report, the Welsh Government should provide an update on the implementation of the recommendations made by the Auditor General for Wales in his 2018 report, *Speak my language: overcoming language and communication barriers in public services*.*

### **Original response: Accept**

In our Mental Health Delivery Plan for Wales 2019-2022 we outline our commitment to ensuring support is equitable and accessible, and that services are delivered in line with the all-Wales standard for communication and information for people with sensory loss.

As part of the ongoing work in relation to successor arrangements for our Together for Mental Health Strategy we will consider what further action is necessary to strengthen access to support for those with sight or hearing loss, and for those whose first language is not Welsh or English.

Wales Interpretation and Translation Services (WITS) annual report states that Arabic was its most commonly requested interpretation language and second most commonly requested translation language in 2022. 99.1% of all requests (for all languages, not just Arabic) were allocated for interpretation and translation services. Welsh Government has recently commissioned a research report into the availability and adequacy of foreign language interpretation services in Wales.

The Deaf People in Wales Report will be crucial in informing ongoing work in this area. In February 2021, the British Deaf Association (BDA) undertook an audit of the British Sign Language (BSL) policies and provision in Welsh Government with a view to signing up to their BSL charter. The BDA and Equality Branch officials have worked collectively with Welsh Government Policy leads to establish what we are doing around BSL.

We also continue to make available mental health resources in multiple languages – to support access to healthcare. Most recently, we have translated resources such as the National Centre for Mental Health Stabilisation Toolkit for people who have been exposed to traumatic events.

The Welsh Government also continues to promote the CALL mental health helpline (and has translated information about the helpline into over 20 languages). CALL also uses Language Line – which means anyone calling the helpline can access support and advice in their preferred language.

### **December 2023 update:**

Welsh Government commissioned research into the availability and adequacy of foreign language interpretation services in Wales was funded through the Migrant Integration Wales Project. The study is available to view [here](#). Officials are undertaking the relevant actions from this research in policy making to help reduce barriers to accessing interpretation and translation services.

As highlighted in relation to Recommendation 7, we are proposing to include actions in the draft Mental Health and Wellbeing Strategy to support this agenda.

Work is also being taken forward to develop guidance for primary care and other health settings in relation to commissioning interpretation and translation services, with a view to driving consistency and promoting equity of access.

The Wales Interpretation and Translation Services (WITS) has also developed new on-line training to promote access to translation and interpretation services. In addition, as part of the Welsh Government's Migrant Integration Wales Project, new supporting materials are being developed to promote a person's right to access these services (using a rights-based approach). These will be promoted on the Sanctuary website.

The BDA Audit Report was published by BDA on 14 February 2023. A Written Statement was issued on the publication date welcoming the report and recommendations. A BSL translation of the written statement was also issued.

The Welsh Government welcomes the report and recognises the need to take an intersectional approach in responding to the Audit's recommendations. Taking forward action from the BDA's Audit requires a long-term plan for change and will require sustained commitment and focus. Some of this work can be taken forward by the Disability Rights Taskforce and other elements will be progressed now. A work plan has been developed to progress areas that can be taken forward outside the remit of the Disability Rights Taskforce<sup>5</sup>.

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<sup>5</sup> For information: On 22 November 2023 a meeting was held between officials and the BDA, during which the BDA was informed that due to budget restraints, work on the BSL Charter has been put on hold.

## **Recommendation 9**

*The Committee recommends that*

*In its response to our report, the Welsh Government should outline what duties are on health boards and other public services to provide interpretation and translation services for languages other than Welsh and English. In doing so, it should provide assurance that the duties in place are adequate, and are being implemented effectively, to reduce the reliance on family members or community volunteers to provide interpretation or translation other than in urgent or emergency cases.*

### **Original response: Accept in principle**

In February 2021, the British Deaf Association (BDA) undertook an audit of the British Sign Language (BSL) policies and provision in Welsh Government with a view to signing up to their BSL charter. The BDA and Equality Branch officials have worked collectively with Welsh Government Policy leads to establish what we are doing around BSL. This includes BSL interpreting and translation provision and challenges of the shortage of these registered professionals in Wales.

The initial results of the BSL Audit Report were submitted to the Welsh Government in August 2021. The draft Report summarised an assessment of the Welsh Government's policies and services, with recommendations to inform an action plan and a proposal for ongoing engagement with Deaf communities. Officials have reviewed the contents of the BDA Audit Report and have finalised the report which will be published by BDA shortly. Officials have met with the BDA and are awaiting a confirmed publication date from the BDA. It is anticipated that this will be published in January 2023. A Written Statement will issue on the publication date welcoming the report and recommendations. A BSL translation of the written statement will also be issued.

The Welsh Government welcomes the report and recognises the need to take an intersectional approach in responding to the Audit's recommendations. Taking forward action from the BDA's Audit requires a long-term plan for change and will require sustained commitment and focus. Some of this work can be taken forward within the Disability Rights Taskforce and some can be progressed now. An assessment will take place to develop a work plan to progress areas that can be taken forward outside the remit of the Disability Rights Taskforce.

Wales Interpretation and Translation Services (WITS) provides access to a wide range of registered interpreters covering approximately 120 languages, including BSL. Partner organisations can access the WITS on demand services through their partner agreement. All Health Boards and Trusts in Wales are now partners to WITS. It is the responsibility of the health board to make requests to WITS and inform the patient.

The 'All Wales Standard for Accessible Communication and Information for People with Sensory Loss' sets the direction for Health Boards and Trusts to ensure the communication and information needs of people with a sensory loss are met when accessing our healthcare services. All health boards and trusts are expected to put in place implementation arrangements to deliver on the standards to ensure all services are accessible and available including for the deaf community through the communication medium of choice, such as BSL.

In 2023, Welsh Government Officials will be working with Health Boards across Wales to undertake a review of all Equality Diversity Inclusion reporting mechanisms, including those for vulnerable groups, and developing recommendations for improving collaboration and providing greater assurance that Equality duties are in place and being implemented effectively.

The 2018 Guidance for Health Boards on the Health and Wellbeing of Asylum Seekers and Refugees sets out expectations for health boards in terms of support for asylum seekers and refugees. In 2021, Welsh Government officials wrote to the health boards to remind them of their responsibilities in delivering the priorities set out in the 2018 Guidance on the health and wellbeing of asylum seekers and refugees, particularly in relation to providing access to interpreters and ensuring that language is not a barrier to accessing services.

**December 2023 update:**

During 2023, the Health and Social Services Equality Team in Welsh Government led a series of workshops with policy leads from across Welsh Government, NHS colleagues, RNIB, RNID, Deafblind UK, the British Deaf Association, Llais and people with lived experiences to explore the barriers faced by people with sensory loss when accessing healthcare.

Recommendations considered included broadening and renewing the All-Wales Standards to include:

- patients whose main language is not English or Welsh,
- patients who have language and communication barriers due to disability, dementia, learning difficulties or autism, and
- parents and carers who have language or communication barriers.

However, in line with a wider approach across Welsh Government, we have taken the difficult decision to pause the work to broaden and renew the All-Wales Standards until we have greater clarity on our 2024-25 budget. We will continue to work on the objectives in the Action Plan which will drive positive changes with the existing Standards.

The BDA Audit Report was published by BDA on 14 February 2023. A Written Statement was issued on the publication date welcoming the report and recommendations. BSL translation of the written statement was also issued.

The Welsh Government welcomes the report and recognises the need to take an intersectional approach in responding to the Audit's recommendations. Taking forward action from the BDA's Audit requires a long-term plan for change and will require sustained commitment and focus. Some of this work can be taken forward by the Disability Rights Taskforce and other elements will be progressed now. A work plan has been developed to progress areas that can be taken forward outside the remit of the Disability Rights Taskforce <sup>6</sup>.

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<sup>6</sup> For information: On 22 November 2023 a meeting was held between officials and the BDA, during which the BDA was informed that due to budget restraints, work on the BSL Charter has been put on hold.

**Recommendation 10**

*The Committee recommends that*

*We endorse and reiterate recommendation 1 made by the Equality and Social Justice Committee in its October 2022 report, Gender based violence: the needs of migrant women, that the Welsh Government should consider creating and maintaining a directory of recognised interpreters.*

**Original response: Accept**

The Welsh Government understands the barriers patients face in accessing services without the use of an interpreter and how this can make them hesitant to access services. The Welsh Government has recently received a report on the availability and adequacy of foreign language interpretation services as part of our Migrant Integration Wales Project. We will look at the recommendations and findings of the report alongside this recommendation and the work of our Migrant Integration Framework. Future work will consider how barriers to access can be removed, working with public and third sector organisations. We will also explore new ways of working to ensure access, which could be incorporated into our communications work on the Migrant Integration Wales Project.

**December 2023 update:**

WITS already exists as bank of self-employed interpreters, and their qualifications are known to WITS, so the most appropriate interpreter can be booked for the job requested.

The work of our Migrant Integration Framework (which is due to be published later this year) includes a short film that is being created to help migrants understand their right to access an interpreter.

Since we responded to the Committee Report earlier this year, further research on the experiences of asylum seekers, refugees and migrants and their access to interpretation and translation services has also been published. Welsh Government officials have been considering the findings from the HEAR 2 Study and are working with Public Health Wales and other stakeholders to address barriers to accessing to services.

**Recommendation 11**

*The Committee recommends that*

*By July 2023 the Welsh Government should publish the key deliverables and qualitative and quantitative measures for the impact of the trauma-informed framework for Wales and put in place a robust evaluation framework. If the Welsh Government is not able to commit in its response to our report to the work being completed within this timeframe, it should explain why it is not achievable and provide information about the timescales within which the measures and evaluation framework will be completed.*

**Original response: Accept in principle**

The new Trauma-informed Practice Framework will be a key component in the Welsh Government's drive to make Wales a trauma-informed nation. The framework will help inform existing and new policy, including the new mental health strategy and the Adverse Childhood Experiences (ACEs) Plan. It will also contribute towards the broader aims of tackling inequality, improving individuals' life outcomes, and making Wales a more prosperous and equal country.

Led by ACE Hub Wales and Traumatic Stress Wales, the framework was developed with stakeholders from various sectors. The Welsh Government played a key role in facilitating and supporting this work and will continue to work closely with partners on the next phase – the successful implementation of the framework.

The first stakeholder meeting about the framework's implementation and evaluation process took place on 23 January 2023. It is expected an implementation plan, including key deliverables, outcomes measures and evaluation processes will be published by the end of July 2023.

**December 2023 update:**

Although not a Welsh Government framework, the Welsh Government was an active participant in the development of the Trauma-Informed Wales Framework, and is continuing to provide support, including funding, for its implementation and evaluation.

We asked the directors of ACE Hub Wales and Traumatic Stress Wales, who are leading on this work, to write to the Health and Social Care Committee to set out their plans and timescales for the Framework's implementation and evaluation. They did so in a letter, dated 30 June 2023, and have offered to provide the Committee with further updates in due course.

We continue to follow their progress in implementing the Framework and we have met the directors of ACE Hub Wales and Traumatic Stress Wales on two occasions and have a third meeting scheduled for the spring. Welsh Government continues to work closely with ACE Hub Wales and Traumatic Stress Wales and are represented on the Framework's Implementation Steering Group, which is currently meeting monthly.

Work is currently taking place to co-produce a theory of change for the implementation and evaluation of the Framework. By the spring, implementation of the Framework will include robust plans to deliver a monitoring and evaluation framework, underpinned by the co-produced theory of change, a communication and engagement strategy, and a repository of training materials that support the Framework's four practice levels. Other important developments already supporting the implementation of the Framework include the development of an accessible version, which will help engagement with diverse communities across Wales, and a collaborative piece of engagement work, led by Platform (working with several children and young people's organisations) to ensure the views of children and young people were captured. Work is also being undertaken to support the inclusion of people with lived experience, including refugees and asylum seekers and those affected by substance misuse. A survey of organisations' understanding and current position with respect to the Framework's principles and practice levels will also be completed soon.



## Recommendation 12

*The Committee recommends that*

*The Welsh Government should work with relevant organisations to ensure that appropriate and supportive information on attachment and parent-child relational health is provided to expectant parents and new parents, for example in literature and via antenatal classes. In line with our recommendation 22, the Welsh Government should provide us with an update on this work in December 2023.*

### **Original response: Accept in principle**

Information to support sensitive and responsive parenting starts at antenatal classes and continues through the pregnancy for mothers and their partners. This support and education continues via a range of personally delivered, written and electronic media in a range of languages through the early years, after midwifery handover to health visiting Services. The work of the First 1000 days project is distilled into key messages for parents to promote attachment and responsive parenting, with specific attention to the child's emotional wellbeing and secure attachment through parental information such as Bump, Baby and Beyond. We will consider what further action we can take to develop parent infant relationship work in planned learning, to include potential areas of learning from the delivery models and approaches being piloted through the early years pathfinder projects, where there is a specific focus on parent-infant relationships and interventions.

We are also considering how the successor to the *Together for Mental Health* Strategy can strengthen support for parent/infant relationship work in Wales.

### **December 2023 update:**

The new (draft) Mental Health and Wellbeing strategy includes a commitment to establish a sustainable approach to ensuring that services support the development of healthy parent infant relationships and infant mental health, including exploring options for specialist teams.

Public Health Wales has a range of resources designed to provide parents with all the essential and important information they need to help the give their children the best start in life. All first-time parents in Wales will get a copy of "Every child: your pregnancy and birth". It discusses many topic areas including how to provide a secure and nurturing environment to give their baby the best start in life. It also signposts new and expectant parents to other reliable sources of information.

Further booklets will be published early next year covering birth to age seven.

**Recommendation 13**

*The Committee recommends that*

*The Welsh Government should work with partners including local authorities, Regional Partnership Boards and community organisations to use the outcomes of its recent community mental health service mapping exercise to co-produce an online directory of community and digital services available locally, regionally and nationally across Wales. The directory should be publicly accessible, should be designed to complement and signpost to information that already exists rather than duplicating it, and should include information about what support is available and how it can be accessed, including whether a referral is required.*

**Original response: Accept in principle**

This information is already available on the 111 website for national support (NHS 111 Wales - Health A-Z: Mental Health and Wellbeing<sup>7</sup>) and via DEWIS for local/community-based support. The CALL helpline handlers have access to a comprehensive directory of local services (by postcode) to signpost people to local support. We also provide more tailored information for specific cohorts, for instance the Youth Mental Health Toolkit which is hosted on HWB. As opposed to developing a new online directory, our aim is to improve the current information available and to ensure people are aware of how to access resources.

We will continue to do that through the Help Us Help You campaign, and other public awareness campaigns, for instance when we launch 111 press 2 for urgent mental health support nationally.

**December 2023 update:**

Throughout 2023 we have continued to promote the mental health and wellbeing support and services (available in the community and digitally) through the Help us Help You campaign and 111 press 2. We are also proposing that the new (draft) Mental Health and Wellbeing Strategy for Wales includes a commitment to develop a standardised approach to provide information about mental health services and how to access them (and in so doing – promote the Active Offer for Welsh language and ensure all information complies with the All-Wales Standard for Accessible Communication and Information for People with Sensory Loss, and where appropriate is children and young people friendly).

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<sup>7</sup> [Mental Health and Wellbeing \(111.wales.nhs.uk\)](https://111.wales.nhs.uk)

**Recommendation 14**

*The Committee recommends that*

*To accompany the publication and ongoing implementation of the social prescribing framework, the Welsh Government should develop and deliver targeted communication campaigns to promote awareness of social prescribing and the new framework among health professionals, services and community groups and organisations to which people could be prescribed, and the general public.*

**Original response: Accept**

A key theme in our recent consultation on the national framework for social prescribing was the acknowledgement that there appears to be significant confusion and lack of awareness both amongst professionals and the public as to what exactly social prescribing can offer.

Furthermore, the consultation acknowledged that for social prescribing services to connect people to community-based support, there needs to be improved awareness of what is available and how accessible it is.

The initial analysis of the consultation responses supports the need for a campaign to build an understanding of social prescribing, its benefits, and to raise awareness of the national framework. As we take forward the development of the national framework for social prescribing, a work programme to raise awareness will be implemented.

**December 2023 update:**

We launched our [National Framework for Social Prescribing](#) (NFfSP), at an online launch event on 7 December 2023.

The National Framework for Social Prescribing (NFfSP) aims to develop a shared understanding of the language used and the approach taken to social prescribing in Wales; support social prescribing practitioners and drive-up skills; set out the outcomes expected from a user, organisation, commissioner, and referrer perspective; and ensure a quality of provision by community assets. It will also monitor and evaluate the development of social prescribing as it continues to grow across Wales.

To help aid a shared understanding of social prescribing, several tools and guidance documents have already been developed, including an explainer short-film, a glossary of terms and a suite of case studies. As we continue to develop the National Framework for Social Prescribing (NFfSP), a work programme to raise awareness will be implemented.

**Recommendation 15**

*The Committee recommends that*

*The Welsh Government's social prescribing framework should include measures by which the health and social impacts and outcomes of social prescribing schemes at local, regional and national levels can be assessed. The Welsh Government should commit to publishing data as part of the ongoing evaluation of the social prescribing framework to enable us and stakeholders to monitor the impact of both social prescribing and the social prescribing framework.*

**Original response: Accept in principle**

The Welsh Government is committed to ensuring the national framework demonstrates the value and monitors the impact of social prescribing. This requires a mixture of qualitative and quantitative measures that focus on the individual, the community, and health services. How best to capture this data and evaluate the health and social impact and outcomes of social prescribing at local, regional, and national levels, is still to be determined.

**December 2023 update:**

One of the core objectives of the National Framework for Social Prescribing (NfSP) will be to monitor and evaluate the development of social prescribing as it continues to grow across Wales.

To do this, we will publish guidance which sets out the core data to be collected by organisations whose primary function is to deliver social prescribing, and which will support the effective performance and evaluation of social prescribing. It is expected to be completed by summer 2024.

Furthermore, we will commission an independent evaluation of the National Framework for Social Prescribing (NFfSP) and its impact.

**Recommendation 16**

*The Committee recommends that*

*In its response to our report, the Welsh Government should outline what actions it will take to develop a more professional structure for the social prescribing workforce, including how it will address variation in pay, terms and conditions, and improve funding sustainability for such roles. In line with our recommendation 22, the Welsh Government should provide us with an update on this work in December 2023.*

**Original response: Reject**

Our 'Connected Communities' strategy already commits the Welsh Government to developing a skills and competency framework for social prescribers which will form an integral part of our national framework for social prescribing.

Over the last few months work has been ongoing with Health Education and Improvement Wales (HEIW) leading the development of a skills and competency framework that makes the link between evidence and practice. The skills and competency framework will help those developing services to deepen their understanding of the social prescribing practitioner role. A draft framework has already been developed by HEIW and its partners, including the Welsh Government, which will be issued for consultation soon.

This skills and competency framework will set out the key knowledge and skills needed to successfully perform the social prescribing role and will go some way to developing a more professional structure for the social prescribing workforce. However, given the complexity of the makeup of the social prescribing workforce, with many based in local authorities and third sector organisations, negotiating specific pay, terms and conditions are outside the remit of the Welsh Government and are the responsibility of the employing organisations. For this reason, we are unable to accept this recommendation.

**December 2023 update:**

A competence framework for social prescribing practitioners in Wales has been developed by HEIW and was launched on 7 December as part of the launch of the National Framework for Social Prescribing. Alongside the competence framework, we aim to launch a skills and knowledge programme containing a suite of training courses and resources, and resources to provide the skills, techniques and knowledge needed to help people who engage with social prescribing.

**Recommendation 17**

*The Committee recommends that*

*In its response to our report, the Welsh Government should set out how it, working with Health Education and Improvement Wales and Social Care Wales, will monitor the impact of the actions in the mental health workforce plan aimed at improving staff wellbeing. It should also commit to publishing annual reports setting out whether the actions in the plan are having the intended impact, and if not, what will be done differently. The first annual report should be published no later than December 2023.*

**Original response: Accept**

Progress on delivery of the actions in the mental health workforce plan and their impact will be monitored through an implementation board established by HEIW and Social Care Wales, which includes people with lived experience, Royal Colleges, the voluntary sector, the Welsh Government and other key stakeholders. Regular updates will be provided to the Welsh Government's Mental Health Oversight and Delivery Board, National Partnership Board, and to the HEIW and Social Care Wales public boards. An annual, public-facing report will be published detailing progress.

**December 2023 update:**

A multi-stakeholder Implementation Board was established and has been meeting regularly since the launch of the plan to oversee delivery. A detailed implementation plan was published in April 2023 setting out key activities and outcomes for each workstream. Ongoing progress updates are provided to the Welsh Government's Mental Health Oversight and Delivery Board, National Partnership Board, and to the HEIW and Social Care Wales public boards. We have published several newsletter updates on our website throughout the year. An annual progress report will be published before the end of January 2024, and we have also commissioned an independent assessment of year one implementation activities and impact to inform our next year of delivery. These newsletters are available [here](#). The annual report, when published, will also be available on this link.

**Recommendation 18**

*The Committee recommends that*

*Once the Welsh Government has published its draft budget for 2023-24, it should confirm which of the actions in the mental health workforce plan have been allocated full funding, which have been allocated partial funding, and which have not yet been allocated funding. It should also provide details of which partially-funded or unfunded actions will be prioritised should further funding become available.*

**Original response: Accept**

The Deputy Minister for Mental Health and Well-being has indicated that support for the implementation of the Mental Health Workforce Plan will be a priority in 2023-24. Between the funding provided for the NHS Wales Education Commissioning and Training Plan (2023-24) and additional funding provided from the mental health programme budget, the Mental Health Workforce Plan will be fully funded in 2023-24.

**December 2023 update:**

As previously reported the Mental Health Workforce Plan was fully funded in 2023-24. We are now undertaking the budget process for 2024-25 and as such are consolidating activity required within the next financial year to achieve the required actions in the implementation plan to continue to support staff wellbeing, recruitment, retention and training.

**Recommendation 19**

*The Committee recommends that*

*The Welsh Government should work with neurodivergent people to co-produce training and awareness-raising campaigns to increase understanding in schools and across public services of neurodiversity. The focus of the training should be on understanding neurodivergent people's lives, how to support and help them, and developing positive, constructive and helpful attitudes and culture, not just on specific conditions. In line with our recommendation 22, the Welsh Government should provide us with an update on this work in December 2023.*

**Original response: Accept**

The Welsh Government has supported the National Autism Team to develop resources for schools and across other sectors, working in partnership with neurodivergent people and parents and carers. The website [autismwales.org](http://autismwales.org) provides details of comprehensive training programmes and awareness raising tools in education, for employers and for community services.

**December 2023 update:**

Our Ministerial Advisory Group continues to be co-chaired by three individuals with neurodivergent lived experience. We are currently exploring participative consultation and co-production with them. The chairs have recently fed back to the DMSS how successful the group is, and how comfortable and supported they were at the most recent face to face MAG meeting.

It is important to ensure that every neurodivergent person has the opportunity to be involved in our work. Therefore, when we go out to consultation on the development of a neurodivergent code of practice, we will ensure our consultation events are conducted in a range of ways to ensure accessibility.

We are working closely with colleagues in ALN to understand some of the barriers facing children and young people in education to improve pathways between health and education.

The National Neurodivergence Team, (previously the National Autism Team) continues to expand its remit across neurodivergence. With the additional posts of a Transformation Project Manager and Family Support Neurodivergence Development Officer the team is co-producing high quality resources, which are equal to the quality of the work they have produced for autism. The work is supported by two Stakeholder Advisory Groups. Initial pieces of work include a film entitled 'What is ADHD', from a lived experience and professional perspective, and resources to support neurodivergent parents.

At our first Children's Neurodevelopmental Services Community of Practice in October, we were pleased to showcase the NHS Wales Award winning work of Aneurin Bevan University Health Board and Parents Voices in Wales. This 'Co-production to support neurodevelopmental services' is supporting the re-shape of children's neurodevelopmental services in Aneurin Bevan. The work will be developed into a case study and will be shared through our Neurodivergence Improvement Programme workstreams and the NEST/NYTH framework work.



We are working with our colleagues in ALN and Professional Learning. A new national offer of professional learning on neurodivergence is under consideration, which would build on the extensive learning and resources available, in partnership with the National Neurodivergence Team.

The National Neurodivergence Team (NNT) has developed a series of training [resources](#) developed and delivered in partnership with autistic people, parents and carers and professionals. It is available on 'Hwb'. They increase the knowledge, skills, and understanding of autism for those working in education settings. The NNT has also established an ALN Co-ordinator (ALNCo) online community of practice.

We are working with Health Education Improvement Wales (HEIW) and Social Care Wales (SCW) to understand the training needs of the workforce. We have recently conducted a workforce survey which has provide us with a useful insight and understanding of the current situation. Next steps will be identified with HEIW, SCW and other key partners in the new year.

The National Neurodivergence Service already has a training framework which is under continuous review. As part of this work, two e-learning modules have been co-produced - 'Understanding Autism' and Understanding Effective Communication and Autism'. These modules have been accessed by over 6,000 staff in health and social care. The modules are available via local authority and health board internal systems as well as the website of the National Neurodivergence Team.

The National Neurodivergence Team is now working to co-produce ADHD resources for adults. They have a lived experience stakeholder group advising on this. They are also working in conjunction with the ADHD service in Aneurin Bevan University Health Board to develop a post diagnostic course. To support this, Aneurin Bevan undertook a survey with adults with ADHD seeking advice on what would be useful to include. All this work will support the development of a variety of resources to support adults with ADHD to live well. It will also support the development of training packages and wider awareness raising for communities, employers, health staff etc. Initially, the Neurodivergence Team will develop an adult ADHD e-learning module.

**Recommendation 20**

*The Committee recommends that*

*The Welsh Government should ensure that the workforce survey to be undertaken across health and social care as part of the mental health workforce plan is undertaken as a matter of urgency, and no later than July 2023. The Welsh Government should work with groups and communities identified through analysis of the diversity data gathered through the survey as being underrepresented in the mental health workforce, and with neurodivergent people, to design and deliver a mentoring and support programme to help them enter the mental health workforce. In line with our recommendation 22, the Welsh Government should provide us with an update on this work in December 2023.*

**Original response: Accept**

Workforce surveys will be undertaken across health and social care before July 2023. Inclusion has been identified as one of the fundamental principles underpinning the plan, with a view to “creating a culture of true inclusion, fairness and equity across the Mental Health workforce”. HEIW and Social Care Wales are engaging with the Ethnic Minorities Task and Finish Group in the first instance to develop an approach that seeks to increase the recruitment and retention of underrepresented groups into the mental health workforce.

**December 2023 update:**

Workforce surveys have been completed and the findings are being used to inform key actions relating to recruitment, retention and training as well as supporting a healthy workforce. HEIW and Social Care Wales also remain engaged with the Ethnic Minorities Mental Health Task and Finish Group, where there has been specific engagement regarding designing training and sharing resources for feedback. HEIW is also working with underrepresented communities to understand their experiences of mental health services as well as influencing factors related to choosing a mental health career. We have events planned in the new year to explore this further and continue to consider equalities in all our implementation actions.

**Recommendation 21**

*The Committee recommends that*

*The Welsh Government should require its civil servants to include, in every submission made to Welsh Government Ministers seeking a decision on policy, legislative, spending or taxation proposals, an assessment of how the recommended course of action will contribute to improving the mental health and wellbeing of the people of Wales.*

**Original response: Accept in principle**

The Welsh Ministers are subject to the sustainable development and well-being duty in the Well-being of Future Generations (Wales) Act 2015, which requires public bodies to carry out sustainable development, and in doing so contribute to the seven well-being goals. Within those goals ‘A Healthier Wales’ is described as “A society in which people’s physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood”. In implementing the WFG Act, the Welsh Government has embedded the Act in how it develops policy and

advice to Ministers. This is part of a more integrated approach to the assessment of policy impact which already includes consideration of health and mental wellbeing through incorporating our established health impact assessment practices.

Alongside the Well-being of Future Generations (Wales) Act 2015, Part 6 of the Public Health (Wales) Act 2017 requires the Welsh Ministers to develop regulations which will require a list of public bodies (including the Welsh Government) to carry out a health impact assessment (which includes considering mental and physical health) in circumstances to be specified in the regulations. Work to develop the regulations was paused initially to focus resources on EU Exit and subsequently to supporting the response to COVID-19. However, work to develop the regulations restarted in 2022 and in a response to a letter from the Health and Social Care Committee, the Minister for Health and Social Services committed to publishing a consultation on the regulations (as required by the 2017 Act) in late Spring/early Summer 2023. In terms of developing the Regulations, we will consider the findings of the committee's report and this recommendation in preparing policy proposals for consultation. In terms of implementing the Regulations within the Welsh Government, we will update our impact assessment approach as needed accordingly once the Regulations are agreed.

In addition to considering the mechanisms which require officials to consider the impact of a decision on health, the focus of our efforts is on developing the understanding and capability of policy and decision makers within Welsh Government so that they have the knowledge, skills and behaviours to design and deliver policy effectively.

**December 2023 update:**

We are proposing that the new (draft) Mental Health and Wellbeing Strategy for Wales includes specific commitments in relation to this recommendation. This includes a commitment to embed the principles of the new strategy throughout the work of Government by ensuring that public bodies undertake health impact assessments that specifically consider the impact on both mental health and wellbeing.

This commitment will be strengthened by our plans to develop regulations under the Public Health (Wales) Act 2017 which require specified public bodies (including the Welsh Government) to carry out a health impact assessment.

A consultation exercise on our proposed Health Impact Assessment Regulations will be going live for a 12-week period in January 2024. During this period there will be a series of engagement events to allow for wider discussion around the proposals and all responses will be considered during the development of the final set of regulations.

Following the publication of the regulations to support the Public Health (Wales) Act 2017, we are also proposing to update our impact assessment approach within Welsh Government and provide additional training to officials to support their policy capability.

**Recommendation 22**

*The Committee recommends that*

*The Welsh Government should provide us with annual updates on progress made in implementing the recommendations set out in this report. The first annual update should be provided in December 2023.*

**Original response: Accept in principle**

The Welsh Government is very grateful to the Health and Social Care Committee for their consideration of this issue. The Welsh Government will continue to update the Health and Social Care Committee on progress in relation to the recommendations outlined in this report as appropriate.

**December 2023 update:**

This written response is provided to fulfil the requirement to provide a first annual update.

**Recommendation 23**

*The Committee recommends that*

*In its response to our report, the Welsh Government should commit to commissioning and publishing independent interim and final evaluations of its new mental health strategy. The interim evaluations should include assessment of the impact of the strategy to date on the mental health and wellbeing of Wales' population, the outcomes it has achieved, and any learning points or recommendations for change. Alongside each interim evaluation report, the Welsh Government should publish details of what actions it will take in response to any learning points or recommendations for change.*

**Original response: Accept**

Plans for ongoing evaluation will be an essential part of the new Mental Health Strategy for Wales. There will need to be specific consideration of learning points and / or recommendations for change as part of any planned evaluations, alongside a focus on progress towards achieving the strategy's planned outcomes and objectives.

**December 2023 update:**

A 'theory of change' is being developed for the new (draft) Mental Health and Wellbeing Strategy (2024-2034). The theory of change will set out the mechanisms by which the strategy is intended to achieve its outcomes. It will be used as the basis for planning an evaluation of the strategy. It is intended that an evaluation of the strategy will be commissioned in due course.

Throughout the strategy, we have also identified several measurable indicators that that we will monitor as part of the implementation of the strategy. These, and further indicators to be identified, will also support the evaluation of the strategy when commissioned.

**Recommendation 24**

*The Committee recommends that*

*In its response to our report, the Welsh Government should confirm that the data to be collated and published as part of the mental health core dataset will enable us and stakeholders to see and track progress over time in mental health inequalities relating to access to mental health services and outcomes for different groups and communities. This should include information about what data will be included, how frequently data will be published, what analysis will be undertaken, and confirmation that the data will be disaggregated on the basis of diversity characteristics.*

**Original response: Accept**

A key priority for the Welsh Government and NHS Wales is to ensure that health and mental health data in relation to race, ethnicity and intersectional disadvantage is actively collected, understood and used to drive and inform continued improvements in services and to ensure the underpinning of equitable outcomes in service delivery. We already publish a range of activity data, some of which includes ethnicity information, as part of the NHS Benchmarking Programme. The latest NHS Benchmarking information for Wales can be accessed online ([nhs.wales](https://nhs.wales))<sup>8</sup>.

In terms of the core dataset, this will include patient level information (for instance gender and ethnicity). We have recently strengthened the governance arrangements to drive this work forward and the current focus is working with health boards to agree the core activity data that will be reported. Our intention is to publish this data and we will update the Committee in due course on the data for publication and the frequency of publication.

The activity measures are one of four elements which will make up the core data set. The other measures are:

- *Patient Reported Outcome Measures (PROMS).*
- *Patient Reported Experience Measures (PREMS).*
- *Clinician Reported Outcome Measures (CROMS).*

We have established an Oversight Group and a refreshed Board with a technical group. The Board has a range of stakeholder members. As well as providing the main oversight and governance line of this programme, the Board will also consider the key findings of the Academic Research, looking at what matters to people in Wales.

**December 2023 update:**

Through the Mental Health Core Data Set, we are prioritising demographic data, such as age, gender and ethnicity which will support our ability to plan services based on the needs and demands of our population.

We understand the need to have data publicly available as soon as practicable and we are working towards having an initial national dashboard on mental health activity as soon as possible, we will then broaden this available data incrementally as the

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<sup>8</sup> [Events - National Collaborative Commissioning Unit \(nhs.wales\)](#)

core dataset evolves. We have also agreed a set of patient experience measures to collect nationally.

Training for health boards to strengthen the recording and use of individual patient experience outcomes data continues. Representatives from over 80% of the mental health and learning disability teams in Wales have now received training in how to embed patient reported outcome and experience measures into day-to-day practice.

Through the new (draft) Mental Health Strategy for Wales we will continue to develop a mental health core dataset as part of the new strategy, which will include a focus on developing data that supports the quality reporting process and ensure that this is embedded into the mental health core dataset. We are also proposing to develop a digital and data plan for mental health. This will align work in DHCW, Health Technology Wales and Tec Cymru to improve digital and data in mental health. It will be based on the principle of parity with physical health and will deliver on key areas including electronic records, data sharing, use of digital across services and improved mental health data.

### **Recommendation 25**

*The Committee recommends that*

*Following the completion of the research commissioned from the University of South Wales on measuring clinical and social outcomes, the Welsh Government should set out a timetable for the development and implementation of wellbeing measures to inform the monitoring and evaluation of the impact the new mental health strategy has on tackling mental health inequalities. In line with our recommendation 22, the Welsh Government should provide us with an update on this work in December 2023.*

### **Original response: Accept**

The Mental Health Outcomes and Measures Board referred to in response to recommendation 24 is considering the outcome of the research as part of developing the outcome measures in the core-dataset. Further information, including timescales, will be shared with the Committee in due course.

The Welsh Government already publishes data on the mean mental wellbeing score for people aged 16 and over in Wales using the Warwick-Edinburgh Mental Well-being Scale WEMWBS) as part of reporting on Wellbeing of Wales: National Indicators<sup>9</sup>.

As part of the Well-being of Future Generations (Wales) Act 2015, we have consulted on and set milestones against Indicator 29 'Mean well-being score for people'. This measure is collected and reported on as part of the National Survey for Wales for Adults and we will utilise the School Health Research Network for children and young people. This will be one of the indicators that will drive future work around promoting population-wide good mental wellbeing, with a focus on narrowing the gap between our most and least deprived communities.

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<sup>9</sup> [Wellbeing of Wales: national indicators \(gov.wales\)](https://gov.wales/wellbeing-of-wales-national-indicators)

As part of the arrangements to develop the successor to *Together for Mental Health*, we have dedicated resource from Knowledge and Analytical Service in the Welsh Government to support the development of key measures to determine progress against the agreed strategic objectives. The proposed measures will be included in the consultation document which is expected to be available by the end of 2023.

**December 2023 update:**

As noted in response to Recommendation 23, a 'theory of change' is being developed for the new (draft) strategy. Throughout the strategy, we have also identified several measurable indicators that we will monitor as part of the implementation of the strategy.



**Recommendation 26**

*The Committee recommends that*

*The Welsh Government should work with the police and crime commissioners and the police forces in Wales to identify opportunities to improve access for police officers to ongoing training in mental health awareness, suicide prevention, neurodiversity awareness, learning disability awareness, and cultural competence. In line with our recommendation 22, the Welsh Government should provide us with an update on this work in December 2023.*

**Original response: Accept**

Policing is reserved to the UK Government and as such the training of police staff is the responsibility of the Home Office rather than the Welsh Government. However, we do recognise the importance of using our partnership links to support effective criminal justice outcomes, especially where policing interfaces with policy areas which are devolved to Wales.

We will broker a discussion with Policing in Wales on:

- The training which is currently available on these subjects and how it is used.
- How accessibility and awareness of the existing training can be increased.
- Where there might be opportunities for new links or further work.

This work will be taken forward with the Police Liaison Unit and relevant Welsh Government policy leads.

In terms of neurodiversity, the Welsh Government funds the National Autism team which provides expert advice and training on neurodivergence awareness. The team has worked with both South Wales and Gwent police on neurodivergence issues. We are also delivering a neurodivergence improvement programme which includes considering workforce training needs. There is a representative from criminal justice on the Ministerial Advisory Group on Neurodivergence, and the team also work closely with the Ministry of Justice to support the non-devolved areas of their neurodiversity strategy.

Additionally, as part of the Welsh Government Learning Disability Strategy the team has supported the development of the Learning Disability Education Framework and its initial roll-out to health professionals. The team is working with Improvement Cymru to scope out how the Framework can be expanded to other public sector organisations, potentially including the police.

**December 2023 update:**

Policing in Wales have reviewed the support available to officers in these areas and provided reassurance on this to the Welsh Government. Frontline officers across Wales are receiving training as part of their probationary periods and ongoing programmes are being delivered by both Force Mental Health Leads and by the respective Training departments. This includes training covering topics such as:

- Mental health awareness (types of illnesses, vulnerability, neurodiversity and incidents);
- Helping people in crisis – what to say, what options are available to help them. This includes signposting individuals to 111 option 2,

voluntary attendance to A&E to see the crisis team, safeguarding at home;

- Recognising those in mental health crisis, suicidal behaviour, self-harm;
- How to engage with suicidal people, understanding why people self-harm;
- Mental health legislation;
- Suicide prevention;
- Staff and officer welfare;
- Autism/neurodiversity training; and
- Equality, diversity, inclusion and cultural competence.

Gwent Police have Autism Champions who have received extensive training. These champions will be known as Neurodiversity Champions soon. Gwent Police also have Dyslexia assessors in the force.

This is just a summary of the more detailed work going on in this area across the four forces.

**Recommendation 27**

*The Committee recommends that*

*In its response to our report, the Welsh Government should provide an update on its discussions with the UK Government on the draft Mental Health Bill. This should include information about whether the Welsh Government has reached a view on whether it supports the UK Government's intention to legislate in the devolved area of mental health, details of the analysis and consultation undertaken by the Welsh Government to inform its view on this matter, and information about the actions taken by the Welsh Government to ensure that the different legislative and policy contexts in Wales and England are being taken into account in the development of the legislation and planning for its implementation.*

**Original response: Accept**

In line with the commitment set out in the Anti Racist Wales Action Plan, we have established an Ethnic Minorities Mental Health Task and Finish Group. When established, the purpose of the task and finish group was to agree tangible actions that can deliver improvements in mental health support and access to services amongst ethnic minority communities, spanning the age range. Originally established for 12 months, the Task and Finish Group will now remain in place for a further two years – and will play an important role in informing the development of the new Mental Health Strategy for Wales. The Task and Finish group will also play an important role in ensuring that new mental health legislation for Wales reflects the needs of minority ethnic communities and will be a key stakeholder in ongoing discussions and work to implement the reforms of the Mental Health Act planned for Wales, and the development of the supporting Code of Practice for Wales.

Following publication of the White Paper outlining proposed reforms to the Mental Health Act aimed at delivering the recommendations of the Wessely Review, Welsh Government officials undertook a series of discussions with stakeholders and partners in Wales, including the Ethnic Minorities Mental Health Task and Finish Group, to determine which of the proposals would be beneficial to Wales. Following those discussions, the Welsh Government wrote to the UK Government Secretary of State for Health to outline our position about which of the proposals we would like to extend to Wales and include in a draft Mental Health Bill. In line with the Sewel Convention, it is likely that a Legislative Consent Motion will still need to be passed in the Senedd once the Bill is introduced, in accordance with section 107(6) of the Government of Wales Act 2006 and the Senedd's Standing Orders. The Welsh Government's final recommendation to the Senedd about whether to pass such a motion will be subject to our being satisfied with the final provisions in the Bill. The draft legislation has been subject to pre-legislative scrutiny in the UK Parliament, and the relevant scrutiny committee published its report on 19 January 2023. The recommendations in that report are likely to result in changes to the proposed Bill compared to the first draft. Welsh Government officials will continue to work closely with their UK Government counterparts to consider the extent to which Wales should be included in any new or substantively different provisions that emerge as the Bill is developed in light of the committee report.

**December 2023 update:**

The Welsh Government had agreed that legislation to reform the Mental Health Act 1983 should extend to Wales, with some exceptions such as in relation to Care and Treatment Plans where we already have measures in place in Wales. However, despite reforms to the Mental Health Act being a Conservative manifesto commitment, the UK Government did not include the Mental Health Bill in the King's Speech delivered on 7 November 2023.

While it is clearly disappointing that this legislation will not be forthcoming, as it was going to include areas that are non-devolved, there are many areas where we can meet the policy intentions without the need for primary legislation. Through the new (draft) Mental Health and Wellbeing Strategy, we commit to implementing a programme of work to support the outcomes intended from the Wessely Review and with the view to addressing racial disparities in the mental health system. We also commit to supporting the digitalisation of the Mental Health Act – including the communication of statutory forms and other documents electronically; raising awareness and improving delivery of the Mental Health (Wales) Measure 2010, including care and treatment planning; and continuing to monitor for opportunities where legislation is the most appropriate mechanism to deliver improvements for mental health in Wales.

The Welsh Government has given its support for the introduction of the Member Bill proposed by James Evans MS, and we will be working with the Member to explore how this legislation can support the aims of the Government around improving the experience and care of people suffering with poor mental health.