



GIG
CYMRU
NHS
WALES

Addysg a Gwella Iechyd
Cymru (AaGIC)
Health Education and
Improvement Wales (HEIW)

Addysg a Gwella Iechyd Cymru (AaGIC)
Health Education and Improvement Wales (HEIW)

Tŷ Dysgu, Cefn Coed,
Nantgarw CF15 7QQ

Ffôn | Tel: 03300 585 005

Ebost | Email: heiw@wales.nhs.uk

Gwefan | Web: aagic.gig.cymru / heiw.nhs.wales

Our Ref: AH/cw

Date: 27 January 2025

Russell George, MS
Chair
Health and Social Care Committee

c/o seneddhealth@senedd.wales

Dear Mr George

Legislative Consent Memorandum for the Mental Health Bill

Thank you for the opportunity to comment on the Legislative Consent Memorandum on the Mental Health Bill, to inform your deliberations. We have limited our response to the area within our specific remit (point 17, workforce), which relates to the impact the Bill will have on mental health practitioners and services in Wales, in the context of staffing pressures and workforce development.

On Staffing Pressures

The bill outlines a series of changes which will increase staff workload – for example in the need to undertake more frequent reviews, appeals, and enhanced oversight of Community Treatment Orders (CTOs) the extension to the responsible clinician role, together with the requirement to manage the removal of police stations and prisons as places of safety and the introduction of new supervised community detention. There are also increased administrative and managerial duties associated with the Bill to ensure compliance.

Our current staffing challenges remain significant, but while this may increase the workload, we believe it also increases the opportunity to escalate radical skill mix changes, and greater collaboration between a range of clinicians and other services such as education and housing. The ethos of the [strategic mental health workforce plan for health and social care](#) was that care would be delivered by the person with the right skills and competence, regardless of profession, job-title or employer, and the adoption of new approaches which utilise competency-based approaches which the plan promotes, are now required even more urgently across Wales, to ensure the opportunities this Bill gives to improving mental health care and support for our population, can be delivered appropriately.

We believe that a key element to addressing some of these workforce pressures relate to the types of practitioners currently able to undertake Part 1 assessments and Part 2 Care coordination functions, as part of the Mental Health (Wales) Measure 2012. Through the [strategic mental health workforce plan for health and social care](#) we have been progressing plans to ensure that there is an appropriate supply of trained professionals to undertake new and existing legal roles, but capacity in this area remains a significant challenge. These current arrangements restrict workforce capacity and planning, are a barrier to diversification of skill mix, including the introduction of emerging and enhanced roles to support delivery of services.

Cadeirydd | Chairman: Dr Chris Jones

Prif Weithredwr | Chief Executive: Alex Howells

Pencadlys HEIW | HEIW Headquarters, Tŷ Dysgu, Cefn Coed, Nantgarw CF15 7QQ

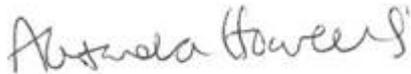
Ffôn | Tel: 03300 585 005

In 2021, HEIW supported a health impact assessment that suggested a competency-based approach to these roles in which other professional groups could receive training and be supervised by registered professionals. This was submitted to Welsh Government but to date we are not aware this has been progressed. We ask that this could be revisited, as further consideration on the implication of these changes would support health boards to prepare for the wider changes coming through the MH Bill, and HEIW would welcome further conversations about this.

On Education and Training

The Mental Health Bill will have impact on the need for education and training for healthcare professionals on the new criteria for detention, treatment and patient rights. This will need to be made available to all frontline practitioners and will require significant planning and delivery. We welcome the opportunity to be involved at the outset so that that we set out and lead the workforce solutions that will be required to enact the legislative changes as swiftly and efficiently as possible.

Yours sincerely



ALEXANDRA HOWELLS
CHIEF EXECUTIVE