

## **Explanatory Memorandum to the Care and Support (Assessment) (Wales) Regulations 2015**

This Explanatory Memorandum has been prepared by the Department of Health and Social Services and is laid before the National Assembly for Wales in conjunction with the above subordinate legislation and in accordance with Standing Order 27.1

### **Minister's Declaration**

In my view, this Explanatory Memorandum gives a fair and reasonable view of the expected impact of the Care and Support (Assessment) (Wales) Regulations 2015. I am satisfied that the benefits outweigh any costs.

*Mark Drakeford*

Minister for Health and Social Services, one of the Welsh Ministers

6 May 2015

## **Part 1 – OVERVIEW**

### **1. Description**

The Social Services and Well-being (Wales) Act 2014 (the Act) brings together local authorities' duties and functions in relation to improving the well-being of people who need care and support, and carers who need support. The Act provides the statutory framework to deliver the Welsh Government's commitment to integrate social services to support people of all ages, and support people as part of families and communities. Sections 19, 21 and 24 of the Act place a duty on local authorities to provide a single process of assessment that will apply to all individuals.

Sections 19, 21 and 24 of the Social Services and Well-being (Wales) Act 2014 impose duties on a local authority to assess an adult's needs for care and support, a child's needs for care and support and a carer's needs for support. The regulations make further provision about such assessments.

This Explanatory Memorandum should be read in conjunction with the Explanatory Memorandum to The Care and Support (Eligibility) (Wales) Regulations 2015.

### **2. Matters of special interest to the Constitutional and Legislative Affairs Committee**

No specific matters identified.

### **3. Legislative background**

The powers enabling these regulations to be made are contained in Sections 19, 21 and 24 of the Social Services and Well-being (Wales) Act 2014. The Act creates a right to an assessment for all people, where it appears to the local authority that the individual may have need for care and support, or support in the case of carers. The Act will simplify the assessment process so that it is appropriate to the needs of the individual and considers the person's circumstances.

This instrument is subject to the annulment procedure by the National Assembly for Wales (the negative procedure).

The Regulations will come into force in April 2016.

#### Current legislation

The current legislative framework is complex and the provision of social care is currently found within a broad array of Acts, which legislate separately for children and adults.

Assessment for adults is covered by the NHS & Community Care Act 1990, Carers and Disabled Children Act 2000 and the Chronically Sick and Disabled Persons Act 1970.

For children Schedule 2 of the Children Act 1989 provides for assessment of children in need.

The principal tools / guidance to assist the assessment of children and adults under the respective pieces of legislation are:

- The Framework for the Assessment of Children in Need and their Families (2001)
- Creating a Unified and Fair System for Assessing and Managing Care (2002).
- The Integrated Assessment, Planning and Review Arrangements for Older People (2013)

Each of these was issued under section 7 of Local Authority Social Services Act 1970 (LASSA).

Section 47 (1) (b) of the NHS and Community Care Act 1990 places a duty on local authorities to decide whether, following assessment, an adult's needs require a service to be provided. Specifically, in Wales the statutory guidance: '*Creating a Unified and Fair System for Accessing and Managing Care*' (FACS) guidance<sup>1</sup> was implemented in 2002, which provides a standardised framework within which local authorities should decide local criteria about which needs should be met. In 2013, this guidance was superseded, for adults over the age of 65, by the 'Integrated Assessment, Planning and Review Arrangements for Older People' issued under section 7 of the Local Authority Social Services Act 1970.

For adults under 65 the FACS guidance requires the use of the Unified Assessment Process (UAP) to evaluate an individual's presented needs and circumstances and how they constrain or support their capacity to live a full and independent life.

Key sub-sets (specialist assessment) have been developed and work within the UAP for mental health and substance misuse domains. These are known as:

- Care and Treatment Planning under the Mental Health Measure (2010), which in June 2012 superseded the Care Programme Approach (CPA) in Wales (although the CPA continues to operate in England) *and*
- The Wales In-Depth Integrated Substance Misuse Assessment Toolkit (WIISMAT).

The Mental Health (Care Coordination and Care and Treatment Planning) (Wales) Regulations 2011 prescribe a care and treatment plan for people in receipt of secondary mental health services. Many of these people will have multiple needs and be eligible for an assessment for community care services. The UAP is the tool that practitioners continue to use as a multi-agency assessment for secondary mental health services and community care services.

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<sup>1</sup> Creating a unified and fair system for assessing and managing Care (FACS), Welsh Government, 2002

Schedule 2 of the Children Act 1989 provides for assessment of children in need and the principal guidance to assist the assessment of children is the *Framework for Assessment for Children in Need and their Families*<sup>2</sup> issued under section 7 of the Local Authority Social Services Act 1970 (LASSA).

The *Framework for the Assessment of Children in Need and their Families* provides a systematic basis for collecting and analysing information to support professional judgements about how to help children and families in the best interests of the child. Practitioners use the framework to gain an understanding of a child's developmental needs; the capacity of parents or caregivers to respond appropriately to those needs, including their capacity to keep the child safe from harm; and the impact of wider family and environmental factors on the parents and child. There are three main aspects of the framework:

- the child's developmental needs;
- parenting capacity, and
- wider family and environmental factors.

The framework is used for the assessment of all children in need, including those where there are concerns that a child may be suffering significant harm.

There are three Acts of Parliament and a Welsh Measure under the National Assembly for Wales, which are directly concerned with the needs of carers. These are:

- Carers (Recognition and Services) Act 1995
- Carers and Disabled Children Act 2000
- Carers (Equal Opportunities) Act 2004
- Carers Strategies (Wales) Measure 2010

In addition, Disabled Persons (Services, Consultation and Representation) Act 1986 Section 8 requires that during an assessment of a disabled person the views of Carers who 'provide a substantial amount of care on a regular basis' should be taken into account. There is no definition of "substantial amount of care on a regular basis".

Under the Carers (Recognition and Services) Act 1995 individuals who provide or intend to provide regular and substantial care are entitled to request an assessment in their own right regarding their ability to provide care and sustain this caring role.

The Carers and Disabled Children Act 2000 gave carers the right to an assessment independent of the community care assessment for the cared-for person.

The Carers (Equal Opportunities) Act 2004 gave local authorities the duty to inform carers of their right to an assessment which should now also consider the carer's wishes in relation to leisure, education, training and work activities.

Children (anyone under the aged of 18 years) who are carers should be routinely assessed under the Children Act 1989. As a matter of law, they could be assessed

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<sup>2</sup> Framework for the Assessment of Children in Need and their Families, The Stationary Office, London, 2001

under the 1995 Act but in practice it is more common for young carers assessments to be carried out in line with the Children Act 1989 guidance.

### Proposed Legislation

The statutory framework will consist of three main elements, the Act itself, regulations made under the Act, and codes of practice/statutory guidance. These three elements work together to form the framework within which social services will operate from April 2016.

The Social Services and Well-being (Wales) Act 2014 will change the way that all individuals and families, including carers, are assessed.

- Section 19 places a duty on local authorities to assess the needs of an adult for care and support where it appears that an adult may have needs for care and support.

This is a wider duty on local authorities than is set out in section 47 of the NHS and Community Care Act which requires that where it appears to a local authority that any person for whom they may provide or arrange for the provision of community care services may be in need of any such services, the authority shall carry out an assessment of his needs for those services; and shall then decide whether those needs call for the provision by them of any such services.

The difference is that whereas the NHS and Community Care Act 1990 requires local authorities to assess whether someone is in need of local authority services the Social Services and Well-being (Wales) Act 2014 requires local authorities both to identify whether someone has needs for care and support (and what those needs are), and also to seek to identify to what extent the provision of care and support, preventative services, Information Advice and Assistance, or other matters could contribute to the outcomes the adult wishes to achieve in day to day life or otherwise meet those needs.

- Section 21 places a duty on local authorities to assess the needs of a child for care and support where it appears that a child may need care and support in addition to, or instead of, the care and support provided by the child's family;

The Act refers to a child in need of care and support whereas Section 17 of the Children Act 1989 defines a child as being in need in law if:

- He or she is unlikely to achieve or maintain or to have the opportunity to achieve or maintain a reasonable standard of health or development without provision of services from the LA;
- His or her health or development is likely to be significantly impaired, or further impaired, without the provision of services from the LA;
- He or she has a disability.

In practice there is little difference here and the distinction is in terminology. The Act creates a broader duty to establish whether a child is in need of care and support and that understanding is refined in the regulations made under the Act.

- Section 24 places a duty on local authorities to assess the needs of a carer for support where it appears to a local authority that a carer may have needs for support;

For the first time carers will have the same rights to assessments and support to meet their needs, as do adults and children in need of care and support.

The Act removes from legislation the requirement that only carers providing a ‘substantial amount of care on a regular basis’ are entitled to a carer’s assessment and defines a carer as someone who provides or intends to provide care to an adult or disabled child.

### **Purpose and intended effect of the legislation**

There have been two valuable reports which have informed the development of the regulations. Primarily the 2011 report “*Better Support at Lower Cost*” commissioned by the Social Services Improvement Agency for Wales (SSIA)<sup>3</sup>, reviewed the current practice on the approaches used by local authorities in delivering efficient care and support services for older people. This report was used to inform the first stages of the legislation reform.

An Assessment and Care Planning Technical Group was established by the former Deputy Minister for Social Services to advise the Welsh Government on producing a suite of regulations and code of practice on the determination of assessment, care planning and review under the Act. The report of that group was also informed by a 2013 SSIA report on “Access to Care and Well-being in Wales”<sup>4</sup>, commissioned by the Welsh Government and co-produced with the Institute of Public Care at Oxford Brookes University. The 2013 report was accepted by the then Deputy Minister and published for comment; and subsequently informed the work of the Eligibility Technical Group<sup>5</sup> which preceded, and made recommendations to, the Assessment and Care Planning Technical Group.

In relation to assessment, the final report from the Assessment and Planning Technical Group<sup>6</sup> recommended that there should be a duty on local authorities, with the help of local health boards where required, to offer a proportionate assessment to anyone seeking help to meet their personal well-being outcomes.

The case for change is set out in the “*Better Support at Lower Cost*” report where it is identified that the single biggest challenge which many Welsh local authorities are facing is how to change the prevailing culture within adult social care. The report recognises that there needs to be a further culture shift towards a service which offers real opportunity to help people become more independent; both in the way they live their lives and how flexibly they can use services. The report, however, notes that there are examples where local authorities have already started to reshape their services for older people, with much evidence of a shift towards a re-ablement approach to care.

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<sup>3</sup> Better Support at Lower Cost - Improving efficiency and effectiveness in services for older people in Wales – SSIA – April 2011

<sup>4</sup> Access to Care and Well-being in Wales – SSIA – March 2013

<sup>5</sup> Report of the Eligibility Technical Group – Welsh Government - June 2014

<sup>6</sup> Assessment and Planning Technical Group – Final Report – Welsh Government – September 2014

The current system can be unclear and confusing, with the focus being placed on the process of the assessment instead of the outcome. Intervention is often triggered at the point of crisis, rather than intervening early through preventative measures. The Act will encourage a renewed focus on prevention and early intervention. The 2011 SSIA report echoes the support for early intervention and prevention, and states that such services will help local authorities to meet their savings targets whilst improving outcomes for individuals.

The report of the Commission on Public Service Governance and Delivery<sup>7</sup> observed:

“We are very clear that public services in Wales face severe and prolonged challenges. The effects of recession and austerity on public-sector budgets will continue to be felt for many years. At the same time, our population is growing, becoming older, and public expectations on the providers of public services are higher than ever before. This creates severe pressures – demand for public services is growing while resources to provide them are falling”.

The pressures on local authority social services departments relate to many factors including, but not limited to:

- People are living longer. Projections show that by 2030 there will be twice the number of people aged over 85 there are currently. The associated costs to social care are explored further in the attached Regulatory Impact Assessment;
- Changing behaviours and expectations; and
- An increase in people with long standing and complex disabilities.

Although demands on social services are increasing, there is no commensurate increase in routine funding to support service delivery. The current financial settlement for 2015/16 has been decreased by 3.4% compared to 2014/15, as a consequence of the large scale budget reductions by the UK Government.

Due to this increase in demand it is essential that the future delivery of social care is transformed. The current system is unsustainable. Specifically there is a need to simplify and improve service efficiency and effectiveness of the system. The system must be improved to deliver better integration, improved collaboration, a stronger workforce, and to provide people with a greater voice and control over their services and well-being.

### Intended effect of the Regulations

The primary objective of the policy is to promote an individual’s independence and ensure they have a stronger voice and control over their care and support. The changes are crucial to enable current and future generations to live their lives independently, providing the correct level of support to maintain their well-being.

The overall effect of the regulations is to provide greater clarity, consistency and quality of care and support for individuals and carers. The aim is that the assessment process

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<sup>7</sup> Report of the Commission on Public Service and Delivery – January 2014 <http://gov.wales/topics/improving-services/public-service-governance-and-delivery/report/?lang=en>

will be more proportionately applied so that it is appropriate to the needs of the individual and considers the person's circumstances. The process will be simplified by introducing a uniform approach to assessment for all people and by simplifying the process itself.

The proposed approach to assessment is consistent with the mental health model in that it is about enabling each individual to achieve their outcomes, as well as with the social model of disability, in that it is about removing the barriers that prevent people achieving those outcomes.

The approach to assessment is also informed by the report of the Independent Commission on Social Services in Wales<sup>8</sup> which observed that "Negative media coverage of social work has, however, promoted a risk averse culture and an over reliance on process. The need is to rebalance towards professional judgment and reflective practice, to assist, safe confident, evidence based-practice".

The proposed approach to assessment in the regulations, sets out that the assessment must be appropriate to the needs of the individual and consider the person's circumstances in the round. The approach supports a move away from the deficit model of care to an emphasis on strengths, capacity and personal resources and focusses on enabling services. The Act and its associated regulations introduce an assessment and eligibility test based on a comprehensive analysis of 5 inter-related elements to ensure that local authorities consider the person's circumstances in the round. These five inter-related elements are set out in the regulations by requiring that in carrying out an assessment, a local authority must:

- assess and have regard to the person's circumstances,
- have regard to their personal outcomes,
- assess and have regard to any barriers to achieving those outcomes,
- assess and have regard to any risks to the person or to other persons if those outcomes are not achieved, and
- assess and have regard to the person's strengths and capabilities.

The assessment process will be proportionate and responsive to people's needs, and will support practitioners to exercise their professional judgement working in partnership with people to agree solutions that are in the best interests of the individual and their families.

The regulations set out the assessment process for individuals as follows:

#### Section 19 – assessing the needs of an adult for care and support

The duty is triggered where it appears to a local authority that an adult may have needs for care and support.

#### Section 21 – assessing the needs of a child for care and support

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<sup>8</sup> From Vision to Action: The Report of the Independent Commission on Social Services in Wales – November 2011 - <http://www.icssw.org/vision/?lang=en>



The duty is triggered where it appears to a local authority that a child may need care and support in addition to, or instead of, the care and support provided by the child's family.

#### Section 24 – assessing the needs of a carer for support

The duty is triggered where it appears to the local authority that the carer may have needs for support.

Section 24 replaces the existing law, and removes the requirement that the carer must be providing “a substantial amount of care on a regular basis”. This will mean more carers are able to access an assessment, and that the duty is comparable to that for the people they support. This will also replace the existing law which applies to young carers, and a carer of a disabled child.

Additionally, the Act provides for refusal of assessment, but equally prescribes the circumstances in which a refusal is to be disregarded. The local authority's duty would not be discharged, for example, where there is a risk of abuse or neglect. It also provides for the combining of different assessments (to better support the integration of assessments required under other statutes / programmes e.g. mental health, special education needs); and creates regulation-making powers for the Welsh Ministers to provide greater detail in relation to assessments. The local authorities' duties with respect to these aspects of the assessment of need are detailed in the Code of Practice for Part 3 of the Act: Assessing the Needs of Individuals.

To support local government and its partners in making the transition to the new arrangements of the Act, a Delivering Transformation Grant was made available to the six regional partnerships and selected national partners to enable local government and its partners to put in place the requirements of the new Act in 2013/14 and 2014/15. Welsh Government has doubled the funding available through this grant to £3m in 2015/16.

#### **4. Consultation**

A 12 week consultation on the regulations ran between 6 November 2014 and 2 February 2015. Further details on the consultation are set out in the Regulatory Impact Assessment attached at Part 2.

## PART 2 – REGULATORY IMPACT ASSESSMENT

This Regulatory Impact Assessment should be read in conjunction with the Regulatory Impact Assessment for the Care and Support (Eligibility) (Wales) Regulations 2015.

The current assessment process is unwieldy and time consuming for both individuals and practitioners to complete. It is not a sufficiently person centred process and does not adequately support people to remain in control of decisions about how their needs are met. With the projected rise in population of those receiving social care in Wales likely to be around 43,000 people by 2030, compared to figures for 2015 the current assessment process is unsustainable.

From an existing 650 fields to be completed during an assessment under the Unified Assessment Process (UAP), the new national assessment and eligibility tool has been redesigned to contain less than 30 fields for completion, seeing a 95% reduction.

The proposed ‘National Assessment and Eligibility Tool’ contains three sections: The national minimum core data set; five elements to achieve well-being; and action / outcome statements.

Research shows that social workers currently spend more time on administrative work and less time on face to face contact with service users. A UNISON survey indicated that 96% of practitioners felt that too much of their time was spent with paper work. Of those surveyed, 73% felt the time they had available to spend with service users was “insufficient” or “very insufficient”.<sup>9</sup>

Similarly, research from 2003 found that three of the activities most frequently reported by social workers were office-based paperwork relating to caseload, negotiating and arranging social services for users, and completing assessment documentation in the office.<sup>10</sup>

The new process will enable resources currently focussed on process and paperwork to be re-invested in supporting people to meet their identified personal well-being outcomes.

This section of the Regulatory Impact Assessment presents two different options in relation to the policy objectives of the proposed regulations. Both of the options are analysed in terms of how far they would achieve the Welsh Government’s objectives, along with the risks associated with each. Both options have been explored to identify the costs and benefits. However, it is recognised that there are limitations and challenges with projecting future demand for social care in Wales.

- Option 1: Do the minimum and retain the current approach to assessment.

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<sup>9</sup> UNISON, *Not Waving But Drowning: Paperwork and Pressures in Adult Social Work Services* (2009), <http://www.unison.org.uk/acrobat/B4710a.pdf> (last visited 4 April 2011). These figures relate to all social work, not just adult social care. We see no reason to suppose there is a significant difference between child work and adult work.

<sup>10</sup> A Weinberg and others, “What Do Care Managers Do? A Study of Working Practice in Older Peoples’ Services” (2003) 33 *British Journal of Social Work* 901, 914.

- Option 2: Create a national system for assessments.

As a basis for making projections about the future expenditure on social care under each option the actual expenditure for 2010/11 (as reported on in the Community Care Statistics report<sup>11</sup>) and 2013/14 (most recent data collection) has been used to make estimates on the predicted expenditure for 2030. These projections correspond with baseline projections by House of Lords Committee on Public Service and Demographic Change<sup>12</sup>. The data contained in the Regulatory Impact Assessment is used for illustrative purposes and offers indicative costings and scenarios, rather than an accurate statement of fact.

This Regulatory Impact Assessment has explored the options and costings. Further details and the analysis of these options are contained in the evidence paper at annex 1.

### **Option 1: Do the minimum and retain the current approach to assessment**

Under this option the current approach to assessment will remain, with the exception of the assessment process for carers. Primary legislation, contained in Section 24 of the Act, sets out the additional duties for assessing the support needs of a carer. On the whole, if the current approach is retained, the assessment process will remain complex and costly without assisting individuals to address their concerns or achieve their desired outcomes, enabling people to maintain their independence or supporting families to remain together.

#### **Costs**

As noted in annex 1, the continuing cost of providing social care for adults in Wales is considered high, particularly in relation to those aged over 85 years and expected to receive local authority social care services in 2030<sup>13</sup>. The projections currently estimate that the number of those aged 85 years and over and in need of social care will increase by 45% between 2013 - 2030. As shown in annex 1 the estimated total cost of assessments for all adults is likely to increase by £19.5m between 2013 and 2030. This is the difference between expenditure in 2013 and 2030, as shown in table 7.

The attached evidence paper (annex 1) shows that within Option 1, 11.1% of gross expenditure on adult social services will be spent on assessment and care management. However, given the projected increase in the older population it is likely that more funding will be required to provide social care in Wales in the coming years. In the absence of any available supporting data, if the projected population levels are realised, and no additional interventions are applied, it is expected that local authorities will need to spend more of their social services budget to cover the required assessment and care management costs, and accordingly the assessment costs. This

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<sup>11</sup> Community Care Statistics, Social Care Activity, England, 2013/14 - <http://www.hscic.gov.uk/catalogue/PUB14397>

<sup>12</sup> Report: Ready for ageing? | Committee on Public Service and Demographic Change | House of Lords - 2012/13

<sup>13</sup> Lord Filkin, Chair of the Lords Committee on Public Service and Demographic Change.

means that expenditure on assessment and care management could likely rise above the current 11.1% of gross expenditure.

Based on evidence from the Audit Commission report 2012<sup>14</sup> '*Spending on Assessment and Care Management in English local authorities*', spending on assessment and care management varied between 8% and 17%. Using these figures the evidence paper shows what the additional costs would mean for local authorities in Wales if they had to cover an increase from the 11.1% estimate of their current operating level, to the highest level identified by the Audit Commission i.e. 17% of their gross expenditure. Local authorities in Wales would have to find an additional £82m (based on 2013/14 figures).

The Local Government Association estimated that there would be a spending gap in the budget for adult social care in England of 29% by 2019/20<sup>15</sup>. Using the same assumptions, and applying this figure of 29% to Wales's budgets, this would represent an additional shortfall of £44m that local authorities would need to find.

Annex 1 identified that some 35% of adult assessments did not result in a service being provided. Under Option 1 these assessments would still need to be conducted and are likely to cost £23m in total, across all local authorities in Wales, in 2030.

Applying the adult costs to children's assessments would mean that by 2030 the costs of assessments for children would exceed £12 million – increasing at a rate of over £100,000 per year.

Whilst there is no evidence on which to base a solid projection of what will happen with carers and their assessments, past experience suggests that a spike in activity may be seen when the new Act comes into force but that this is likely to settle down over time.

## **Benefits**

If the system remains the same local authorities will not need to change any of their processes and procedures nor require any further training of staff of those already working in the social care system. No further benefits have been identified under this option

## **Risks**

The Report of the Independent Commission on Social Services in Wales<sup>16</sup>: "From Vision to Action" observed that " Helping to make service users co-producers in their own solutions wherever possible is also much more likely to help people to retain or regain whatever degree of independence is achievable rather than allow them to slip into avoidable dependency. Avoidable dependency is a poor outcome for individuals as

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<sup>14</sup> Reducing the cost of assessment and reviews - Audit commission – August 2012 - <http://www.audit-commission.gov.uk/2012/08/reducing-the-cost-of-assessments-and-reviews/>

<sup>15</sup> Adult social care funding: 2014 state of the nation report – Local Government Association - October 2014 - [http://www.local.gov.uk/publications/-/journal\\_content/56/10180/6659174/PUBLICATION](http://www.local.gov.uk/publications/-/journal_content/56/10180/6659174/PUBLICATION)

<sup>16</sup> "From Vision to Action": The Report of the of the Independent Commission on Social Services in Wales – November 2010

well as a continuing drain on resources.

Without a more nationally consistent model that is less complex and process based the current weaknesses within the system are likely to become more evident as more people are anticipated to be receiving social care services in the future. This in turn may lead to resources becoming more limited and may lead to more care and support needs being judged as ineligible as local authorities attempt to manage their limited resources. The Care and Social Services Inspectorate Wales (CSSIW) has already reported this trend in their publication *National Review of Access and Eligibility Criteria in Adult Social Care, Sept 2010*<sup>17</sup> where it was reported that the current system is a potential barrier to individuals receiving services and screening individuals out of eligibility.

Retaining the existing system may create further unnecessary burdens on local authorities and impede individuals in accessing support services.

The Independent Commission on Social Services in Wales<sup>18</sup> commented that “Proper assessment and proper records are important but it is about finding the right balance in professionals’ workloads, particularly at a time of rising demand and shrinking resources. In our view there are important opportunities for streamlining the processes.” and recommended that the Welsh Government should “review assessment systems for both adults and children as a significant contribution to improved efficiency and the better use of professional time and skills”.

If the system is not changed, in light of the evidence for the need for change, there is a risk of reputational damage for the Welsh Government.

The current model cannot deliver the Welsh Government’s commitments to equality of provision set out in the Sustainable Social Services (SSS) framework. The current system provides different systems for children, adult and carers and does not provide an integrated service for all people, which is a requirement of the Sustainable Social Services framework.

Ultimately, the current system is unlikely to cope with an increased number of people needing care and support, and the pressure on the system, in future years, will result in system failure and people failing to achieve their outcomes.

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<sup>17</sup> National Review of Access and Eligibility Criteria in Adult Social Care, Care and Social Services Inspectorate Wales, September 2010

<sup>18</sup> From Vision to Action: The Report of the Independent Commission on Social Services in Wales, November 2010

## **Option 2: Create a national system for assessments.**

Under this option a single process of assessment will apply, through the regulations, to all individuals, whilst introducing distinct considerations for adults, children, and carers as set out in the Code of Practice. The proposed option will introduce changes to local authorities' core processes and ensure that assessments are based on a holistic understanding of each individual. The assessment will be based on identifying and understanding:

- a person's well-being outcomes,
- the resources available to the person,
- the barriers to achieving those outcomes,
- the risks to themselves and others, and
- their needs for care and support,

in order to agree the most appropriate support for each individual.

### **Costs**

Under this option the Welsh Government considers that there will be long term cost savings both through a reduction in the length and complexity of the assessment process, and through the practice of supporting individuals and families at an earlier stage through the Information, Advice and Assistance Service and preventative services. All local authorities in Wales currently operate an information system, although these differ in structure and approach.<sup>19</sup> Although there is an expectation that local authorities will need to invest to further to develop and expand these into an Information, Advice and Assistance Service as detailed under the Act it has not been possible to quantify what this will mean because the starting points for local authorities will be different.

As noted in annex 1, currently on average 48% of adults over the age of 85 receive local authority social care services all having completed the Unified Assessment Process, which is known to be time consuming for both individuals and practitioners<sup>20</sup>. By 2030 the numbers of individuals requiring a care and support assessment is likely to equate to around 160,000 individuals (table 2). The proposed new model will deliver efficiencies by simplifying the structure of the assessment process and by placing a focus on early intervention and prevention services. It is therefore predicted that the percentage of these individuals who will receive local authority social care services will be reduced. The 2011 SSIA Report: *"Better Support at Lower Cost"* concluded that "Typically, a council which has an effective domiciliary care re-ablement service can expect to see a 10% reduction in demand for domiciliary care through a combination of [preventative] measures"

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<sup>19</sup> Provision of Information Advice and Assistance on Social Services and Well-being across Wales – SSIA – April 2014

<sup>20</sup> UNISON, *Not Waving But Drowning: Paperwork and Pressures in Adult Social Work Services* (2009)

Annex 1 shows the cost savings that could be reached if local authorities reduced expenditure on assessment and care management from the current 11.1% to 8%. Under Option 2, the expectation is that local authorities in Wales would follow this pattern and realise similar efficiencies. If these efficiencies can be met, they could represent savings amounting to £43m based on the gross social services expenditure in Wales in 2013/14. This is the difference between spending at 8% and spending at 11.1% of the gross expenditure for adult social services as at 2013/14 (Table 5). If these savings were realised then these costs could be reallocated for service delivery.

The funding gap of £44m identified in Option 1 is still relevant for Option 2. However, the potential saving of £43m, identified in the above paragraph, could be used to off-set this funding gap if local authorities were to operate at 8% of the gross expenditure

Annex 1 has shown that the estimated total cost of assessment for all adults is likely to increase by £19.5m between 2013 and 2030. This is the difference between expenditure in 2013 and 2030 as shown in Table 7. However, under Option 2 the amount of assessments undertaken is expected to reduce considerably as these would be applied proportionately. This could result in a £19.5m cost saving, which could be used to off-set this funding gap of £44m, as identified in the paragraph above.

The new assessment process proposed under Option 2 for children is considered to be in keeping with the assessment process that is currently in place under the Children Act 1989. As a result it is anticipated that costs for children's services will not be expected to alter significantly.

In practice, the proposed system under Option 2 could address the needs of many carers through the initial Information Advice and Assistance service. Carers will be provided with access to relevant, accurate, high quality and timely information, advice and assistance, which may meet their needs without the requirement for a complex, in-depth, UAP-style assessment. Instead, the assessment process will be applied in a manner proportionate to the presenting support needs of the carer; but there are no specific costs that can be evidenced.

The report to Welsh Local Government Association and NHS Confederation on the transitional and longer-term implications of the Social Services and Well-being (Wales) Bill commented<sup>21</sup>: "The push for greater integration of assessments and the introduction of proportionate assessments should allow local authorities to manage and respond to demand as it changes, and there is no reason to assume that the changes proposed will inevitably lead, in the long term, to greater costs for local authorities. Indeed there is the potential for savings and greater cost-effectiveness if individual authorities get their assessment practice right".

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<sup>21</sup> Transitional and longer-term implications of the Social Services and Well-being (Wales) Bill 2013 – Welsh Local Government Association and NHS Confederation – IPC September 2013

## **Benefits**

The critical benefit, under Option 2, is the expectation that there will be fewer individuals needing to receive a disproportionately complex assessment for care and support, or support if they are a carer. The proposed approach will offer a proactive approach which encourages people to seek help earlier and supports them to help themselves to retain their independence in a proportionate way.

Individuals will be provided with a greater voice and control over their care and support arrangements and there will be an expected reduction in the amount of time practitioners spend in completing paper work, with the 95% reduction in the fields requiring completion in the new National Assessment and Eligibility Tool. Research from Portsmouth in 2013, demonstrates that it is possible to achieve a 70% reduction in the time practitioners spend on assessment meetings and associated paperwork<sup>22</sup>.

The proposed regulations will bring greater clarity, consistency and improved quality of care and support for all individuals.

The approach will support people to remain in control of decisions about their own care and how they will be supported to achieve their outcomes.

Individuals are likely to benefit from improved consistency and equality to access care and support, quicker proportionate assessments of their needs, and have the burden of having to repeat information, to many different practitioners during the assessment process removed.

The first report of the Review of Child Protection undertaken for the Department of Education in England by Professor Eileen Munro<sup>23</sup> commented that: “ The (current) assessment framework and process is inefficient and does not easily facilitate professional judgment about risk and safe next steps for a child, young person and their family ...” and “social workers are required to spend too much time completing documentation ....”

## **Risks**

The proposals under Option 2 are based on a new model of social care, for which there is no precedent. This includes the assumptions that have been made in Annex 1, which are based on data that has not been fully tested. The risk is that potential outcomes may differ from those that have been predicted. However, we know that the current model of assessment is too costly, with respect both to its operation and to its effectiveness as a method for ensuring that people are accessing the right care, in the right place, at the right time. The cost and efficacy of the existing assessment process is a significant factor in the analysis that leads to the conclusion that the current model

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<sup>22</sup> <http://www.communitycare.co.uk/blogs/adult-care-blog/2013/09/saying-goodbye-to-unnecessary-paperwork-in-personalisation/>

<sup>23</sup> The Munro Review of Child Protection. Part One: A Systems Analysis - Professor Eileen Munro – Department of Education 2010



for identifying needs and delivering social care is not a sustainable model in the long term.

Preparing the workforce and the population is a key element to ensuring that there is a smooth transition to the new system. There will be considerable transitional costs associated with the training / re-training of local authority staff and producing associated supporting resources associated with this option. As the assessment process is such a fundamental part of the proposed new social care system, the costs of introducing these regulations will consume a greater proportion of the overall transitional costs.

To mitigate against this risk Welsh Government has commissioned the Care Council for Wales to lead on the development and implementation of a national learning and development strategy.

The strategy is critical to the implementation of the Act and will need sustained, deliberate and high-profile leadership, which can reach out across a wide range of organisations and partners beyond the boundaries of the traditional social care sector.

The Care Council has developed this work with key stakeholders to ensure that the strategy covers all of those involved in the provision of social care, together with their key partners, and that it is delivered jointly and in collaboration with those partners.

The strategy includes a training deployment plan and the development of a one-stop-shop resource hub, playing a key supporting role for the sector in readiness for the changes and a place where Care Council for Wales can host their training resources. The Care Council for Wales will also update and promote the basic awareness raising materials. These awareness raising materials will be a common tool for use across partners to support and encourage delivery. The resources and material developed by the Care Council will be made available free of charge to all organisations and will be published online.

These developments have been supported by £1m in 2015/16 through the Social Care Workforce Development Programme (SCWDP). A further £7.1m has been made available through the programme, in previous years, together with the local authority match funding - making a total of some £11m which will support the development and implementation of cross-sector regional training plans, which align with both the national strategy and regional implementation plans.

In 2013/14 and 2014/15, a Delivering Transformation Grant was made available to the six regional partnerships, and selected national partners, to enable local government and its partners to put in place the requirements of the new Act. The Welsh Government has doubled the funding available through this grant to £3m in 2015/16. This is in addition to the £20m already announced this year to carry on the work of projects funded through the Intermediate Care Fund, and the £10m increase in the Revenue Support Grant for Social Services. To ensure that support for implementation of the Act evolves into support for the embedding process post April 2016 a further £3m in grant funding will be made available in 2016/17, subject to budgetary decisions.

The Welsh Government intends to commission an evaluation to enable the impact of the new national model of assessment and eligibility to be considered.

## Summary and preferred option

Welsh Government considers that Option 1 - retaining the current model, is not sustainable. The costs of providing social care using the current model are too high.

The Welsh Government considers Option 2 to be the preferred option to ensure that greater clarity, consistency and quality of care and support for individuals and carers. The introduction of the regulations will ensure that the assessment process is proportionately applied, so that it is appropriate to the needs of the individual, and considers the individual's circumstances.

The proposed model will also ensure individuals are able to live their lives independently and are provided with a stronger voice and control over the decision that affect them. Option 2 is also consistent with case for change as set out in the many reports that have been referenced in the Explanatory Memorandum.

	<b>Current model: at 2013/14</b>	<b>Option 1: at 2030</b>	<b>Option 2: at 2030</b>
Total cost for Assessment and Care Management expenditure (noted in table 1)	£153m	£235m	£110m

## Consultation

The Welsh Government undertook a 12 week consultation on the regulations between 6 November 2014 and 2 February 2015. The consultation on parts 3 and 4 covered 'assessing the needs of individuals, eligibility, direct payments and care planning'.

There were 103 responses received from a variety of stakeholders, including the Welsh Local Government Association (WLGA), The Children's Commissioner, The Older People's Commissioner, Social Services Improvement Agency (SSIA), Local Government representatives and Third Sector Organisations

There was general support for the proposed system change to an outcomes-based approach with a simplified assessment and care planning process and greater integration of services.

The consultation responses identified a need to ensure that the Code of Practice provided a clear explanation of the process of assessment and determination of eligibility. In response to points raised during the consultation process, amendments were made to the regulations, and the codes of practice were re-drafted to ensure that the process for assessment is clear to follow.

A priority from many responders is to reallocate resources to staff training and workforce development. The Care Council for Wales, as the lead body for workforce development, has been commissioned to lead on the development and implementation

of a national learning and development strategy. The strategy is critical to the implementation of the Act and will need sustained, deliberate and high-profile leadership, which can reach out across a wide range of organisations and partners beyond the boundaries of the traditional social care sector.

Further detail on the consultation process can be found in annex 2.

A detailed consultation response report has been published on the Welsh Government's website.

## Competition Assessment

Competition Filter Test	
Question	Answer yes or no
Q1: In the market(s) affected by the new regulation, does any firm have more than 10% market share?	No
Q2: In the market(s) affected by the new regulation, does any firm have more than 20% market share?	No
Q3: In the market(s) affected by the new regulations do the largest three firms together have at least 50% market share?	No
Q4: Would the costs of the regulation affect some firms substantially more than others?	No
Q5: Is the regulation likely to affect the market structure, changing the number or size of businesses/organisations?	No
Q6: Would the regulation lead to higher set-up costs for new or potential suppliers that existing suppliers do not have to meet?	No
Q7: Would the regulation lead to higher ongoing costs for new or potential suppliers that existing suppliers do not have to meet?	No
Q8: Is the sector characterised by rapid technological change?	No
Q9: Would the regulation restrict the ability of suppliers to choose the price, quality, range or location of their products?	No

The filter test shows that it is not likely that the regulation will have any detrimental effect on competition; therefore a detailed assessment has not been conducted.

### Post implementation review

The Social Services and Well-being (Wales) Act 2014 contains provisions to allow for Ministers to monitor functions of the Act carried out by local authorities and other bodies. Ministers may require these bodies to report on their duties in implementing these regulations.

The Welsh Government intends to commission an evaluation to enable the impact of the new national model of assessment and eligibility to be considered.

Additionally, the Welsh Government will continue to monitor the impact of the regulation on areas such as the Welsh language, the UN rights of the child and Older People and Equality.

## Annex 1 – Doc 1

### Evidence Paper

## **Annex 1. Evidence Paper**

### **The Care and Support (Assessment) (Wales) Regulations 2015**

The Regulatory Impact Assessment presents two different options in relation to the policy objectives of the proposed Regulations. Both of the options are analysed in terms of how far they would achieve the Welsh Government's objectives, along with the risks associated with each. Both options have been explored to identify the costs and benefits. However, it is recognised that there are limitations and challenges with projecting future demand for social care in Wales.

- Option 1: Do the minimum and retain the current approach to assessment.
- Option 2: Create a national system for assessments for both users and carers.

#### **Option 1: Do the minimum and retain the current approach to assessment**

Under this option the current approach to assessment will remain, with the addition of an assessment process for carers. Primary legislation, contained in Section 24 of the Act, sets out the additional duties for assessing the support needs of a carer. On the whole, if the current approach is retained, the assessment process will remain complex and costly without assisting individuals to address their concerns or achieve desired outcomes.

The regulations on Assessment, Eligibility and Care Planning are designed to ensure a full system change. The option to continue with the current approach to assessment will not support the delivery of the proposed new approach to eligibility and care planning. The proposed approach to eligibility requires a process of assessment that is based on understanding a person's well-being outcomes, identifying the resources available to the person, the barriers to achieving those outcomes, the risks to themselves and others, and their needs for care and support, in order to agree the most appropriate support for each individual.

The current approach to assessment for care and support is inconsistent across Wales and ineffective in helping people to get the right support at the right time. New arrangements are needed which promote greater voice and control for the individual with a more mature relationship between the individual and those services which promote care and well-being.

Additionally, if the full system change is not achieved, variations in what service users can expect in different parts of the country will remain, as evidenced by the Independent Commission on Social Services in Wales<sup>24</sup> and the Care and Social Services Inspectorate for Wales<sup>25</sup>.

A new duty to assess the needs of a carer for support is placed on local authorities through the Social Services and Well-being (Wales) Act 2014. The duty is comparable

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<sup>24</sup> From Vision to Action: The Report of the Independent Commission on Social Services in Wales - 2009

<sup>25</sup> CSSIW – Suite of reports in relation to Arrangements for the Assessment and Care Management of Adults – 2011/12

to the duty for those that the carer supports. The new duty under the Act has removed the existing requirement that the carer must be providing “a substantial amount of care on a regular basis” and replaced this with the requirement that the person “provides, or intends to provide, care”. This new duty to assess a carer’s needs for support requires a new approach to assessment.

## **Option 2: Create a national system for assessments for both users and carers**

Under this option a single process of assessment will apply to all individuals. The proposed approach to assessment will introduce changes to local authorities’ core process for assessment to ensure that assessment is based on understanding of each individual. The assessment will be based on identifying and understanding:

- a person’s well-being outcomes,
- the resources available to the person,
- the barriers to achieving those outcomes,
- the risks to themselves and others, and
- their needs for care and support,

in order to agree the most appropriate support for each individual.

The regulations on Assessment, Eligibility and Care Planning will ensure a full system change. To fully implement the suite of regulations, it is essential that the current model of assessment is improved. Option 2 will simplify the assessment process so that it is appropriate to the needs of the individual and promotes greater voice and control with a more mature relationship between the individual and those services which promote care and wellbeing.

Although the proposed regulations will introduce a single process of assessment that will apply to all people, they allow for particular and distinct considerations when assessing the needs of adults, children, and carers.

An additional duty on the local authority is that carers will be entitled to an assessment in their own right, no matter how much care they provide. The new legislation will remove the requirement for the individual to provide a ‘substantial’ amount of care before they become entitled to an assessment and replaced this with the requirement that the person “provides, or intends to provide, care”. This change is consistent with the consultation paper proposed on Adult Social Care<sup>26</sup> where it was stated that the ‘regular and substantial’ test lacked clarity, was overly complex, and was apparently being applied inconsistently.

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<sup>26</sup> Adult Social Care – Law Commission No 326 – Section 7.10 - 10 May 2011

## Baseline Evidence and Projections

Although demands on social services are increasing, there is no commensurate increase in the routine funding to support service delivery. The current financial settlement for 2015/16 has decreased by 3.4% compared to 2014/15, as a consequence of the large scale budget reductions.

A 2011 report from the Social Services Improvement Agency (SSIA)<sup>27</sup> outlined the challenges in projecting future demand for social care in Wales. The report recognised the complexities within the process and recognised that the projections may be affected, in part, by the way in which local authorities shape their services. The report also suggested that building a care and support system that focuses on keeping older people out of residential care, and using re-ablement models of care, may assist not only in achieving better outcomes for individuals, but also in reducing demand for services.

A report by the Institute for Fiscal Studies<sup>28</sup> summarises the challenges in predicting the allocation of funding for social care. The report outlined that there is substantial uncertainty about how much the Welsh Government will have to spend over the next 12 years. The most optimistic scenario is that the Welsh block grant will only be around 8% higher in real terms in 2025/26 than in 2010/11: this represents an annual average growth rate of just 0.5%. Given population growth, the block grant available per person would be just 1% higher per person than 15 years earlier. With regard to social care, the projections are subject to wide margins of error, reflecting uncertainty about future demands for health and social care, and the future costs of providing these services.

It is recognised, therefore, that making assumptions for the future delivery of social care is complex on multiple levels. However, as a basis for making projections about the future expenditure of social care under each option, the actual expenditure for 2010/11 (as reported on in the Community Care Statistics report<sup>29</sup>) and 2013/14 (most recent data collection) have been used to make estimates on the predicted expenditure for 2030. These projections correspond with baseline projections by House of Lords Committee on Public Service and Demographic Change<sup>30</sup> used in its 2013 report “Ready for Ageing”<sup>31</sup>.

To date, England and Wales have used the same legislation and virtually the same model for assessments in social care. Based on these similarities, and for the purposes of illustrating cost savings and expenses, assumptions have been based on Welsh figures wherever possible. Where these figures are not available, the most comparable English data sets have been used.

<sup>27</sup> Better Support at Lower Cost: Improving efficiency and effectiveness in services for older people in Wales - SSIA – April 2011

<sup>28</sup> Scenarios for the Welsh Government, Budget to 2025/26, Institute for Fiscal Studies – September 2013

<sup>29</sup> Community Care Statistics, Social Services Activity, England – 2013/14 – July 2014

<sup>30</sup> <http://www.parliament.uk/business/committees/committees-a-z/lords-select/public-services-committee/report-ready-for-ageing/overview/>

<sup>31</sup> <http://www.parliament.uk/business/committees/committees-a-z/lords-select/public-services-committee/report-ready-for-ageing/overview>



Calculations have been based on data provided by StatsWales,<sup>32</sup> Health and Social Care Information Centre (HSCIC)<sup>33</sup>, and on direct comparisons to calculations made for the Care Act 2014 in England, much of which have been based on HSCIC data. Information based on the existing Fairer Access to Care (FACS) model has also been used.

The following sections convey the estimated cost of an assessment for care and support and population projections which have been used to make assumptions on expenditure for both options 1 and 2.

As a baseline, data for 2013/14 has been used (as it is the most recent used).

### Population Projections for Wales

Projections<sup>34</sup> show that by 2030 there will be twice the number of people aged over 65 years than there were in 2010 living in England. If existing rates of prevalence, for various health conditions and care needs, are applied to this changing demographic picture, then this implies that there will be significant increases in need for social care services in future. However, improvements in health and care services, including better prevention, could play a role in counteracting some of these pressures<sup>35</sup>.

The census collection for Wales was reported upon in 2011 and the population projections for 2013 and 2030 have been used to make assumptions of the population.

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<sup>32</sup> Welsh Government's online repository for detailed statistical data for Wales. The data is updated by the Knowledge and Analytic Services (KAS), Welsh Government.

<sup>33</sup> Health and Social Care Information Centre (HSCIC) - The national provider of information, data and IT systems for health and social care in England

<sup>34</sup> Report: Ready for ageing? | Committee on Public Service and Demographic Change | House of Lords - 2012/13 (Lord Filkin, chairman of the Lords Committee on Public Service and Demographic Change)

<sup>35</sup> Future of Paying for Social Care in Wales – LE Wales – April 2014

**Table 1: Population projections for Wales (Adults)**

	2011 <sup>36</sup>	2012	2013	2014	2015	2030 (Estimated)
Number of adults aged 18-64 living in Wales	1,867,505	1,857,283	1,853,049	1,851,715	1,852,593	1,814,014
Number of adults aged 65 – 74 living in Wales	300,550	318,140	329,161	337,726	345,293	380,617
Number of adults aged 75 – 84 living in Wales	187,434	190,806	193,832	197,447	200,549	286,975
Number of adults aged over 85 living in Wales	74,560	76,932	77,332	78,952	80,972	141,037
<b>Total</b>	<b>2,430,049</b>	<b>2,443,161</b>	<b>2,453,374</b>	<b>2,465,840</b>	<b>2,479,407</b>	<b>2,622,643</b>

The figures in table 1 demonstrate that there is expected to be a 55% rise in those aged over 65 years, living in Wales from 2011 to 2030. These estimates are consistent with the projections for England, where there is a predicted 50% increase of those aged over the age of 65 years living in England.

The predictions also show that there is likely to be a slight decline (-3%) in the number of adults aged 18 - 65 years living in Wales between 2011 and 2030.

On average, about 1.5% of adults aged 18-64 years, and about 14% of over 65s in Wales receive local authority social care services. For the group of people aged 65 years and over there is significant variation across age bands in the proportion of individuals receiving local authority social care services: the ratio share of the population aged 65-74, 75-84 and 85+ years is around 5%, 16% and 48% respectively. These ratios have stayed broadly constant over the last six or seven years.<sup>37</sup>

Table 2 has used these average projections to work out the percentage of the population who are likely to receive a local authority social care service in the years between 2011 and 2015, and then used these figures to estimate the proportion of population receiving local authority social care services in 2030.

<sup>36</sup> Stats Wales: 2011 Census: Usual resident population by single year of age and sex, Wales

<sup>37</sup> Future of Paying for Social Care in Wales – LE Wales – April 2014

**Table 2: Proportion of population receiving local authority social care services by age**

	2011 <sup>38</sup>	2012	2013	2014	2015	2030 (Estimated)
Number of adults aged 18-64 living in Wales (1.5% of population)	28,013	27,859	27,796	27,776	27,789	27,210
Number of adults aged 65 – 74 living in Wales (0.5% of population)	15,028	15,907	16,458	16,886	17,265	19,031
Number of adults aged 75 – 84 living in Wales (16% of population)	29,989	30,529	31,013	31,592	32,088	45,916
Number of adults aged over 85 living in Wales (48% of population)	35,789	36,927	37,119	37,897	38,867	67,698
Actual total number of adults receiving local authority social care services:	109,334	111,810	110,895	110,415	Not known	Not known
Total predicted number of adults receiving local authority social care services	108,818	111,223	112,386	114,151	116,008	159,855

If the current model of social care remains, overall there is like to be a 45% increase in those receiving local authority social care services between 2011 and 2030 (as noted in table 2).

The table reflects the actual number of adults receiving local authority social care services in the years between 2011 and 2014<sup>39</sup>. When the percentages of those who are predicted to use local authority social care services in the future, are applied the population projections, they are broadly consistent with those who actually received services. Therefore, the estimates of the population who are likely to received local authority social care services have been used to illustrate the variations of expenditure when the options are applied in practice. These variations have been used throughout the Regulatory Impact Assessment to provide cost effectiveness of the proposed options.

<sup>38</sup> Stats Wales: 2011 Census: Usual resident population by single year of age and sex, Wales

<sup>39</sup> Stats Wales: CARE0005: Adults receiving services – 2013/14

**Table 3 - Population projections for Wales (Children)**

	2011 <sup>40</sup>	2012	2013	2014 <sup>41</sup>	2015	2030 (Estimated)
Number of children aged 0-18 living in Wales	632,433	630,906	630,211	629,235	627,758	652,571

The figures in table 3 demonstrate that between 2011 to 2030 there is expected to be a 3% rise in those aged under 18 years and living in Wales.

**Table 4 - The rate of looked after children per 10,000 under 18 years in England and Wales**

Years	Wales	England
2003	64	Not known
2004	66	Not known
2005	67	Not known
2006	70	Not known
2007	72	Not known
2008	72	Not known
2009	73	54
2010	81	57
2011	85	58
2012	90	59
2013	91	60
<b>2014 (As of 31 March 2014)</b>	<b>91</b>	<b>60</b>

Table 4 demonstrates that the rate of 'Looked After' children per 10,000 people under 18 years has risen steadily in Wales in the last 10 years, and is around 50% higher than the rate in England<sup>42</sup>.

#### Assessment and Care Management Expenditure

Based on evidence from the Audit Commission (2012)<sup>43</sup> report spending on assessment and care management in English local authorities represented an average of 12% of gross spending on adult social services. It further stated that this spend varied across local authorities, between 8% and 17%.

40 Stats Wales: National level population estimates by year, age and UK country Mid-Year population estimates (1991 onwards), by Welsh local authorities, English regions and UK countries, for single year of age and gender (2011, 2102 and 2013 data)

41 Stats Wales: Population projections - 2012-based national population projections for Wales, 2012-2037

<sup>42</sup> British Association for Adoption and Fostering (BAFF) - <http://www.baaf.org.uk/res/stats>

<sup>43</sup> Value for money in assessments and reviews - Audit Commission – August 2012

Using data provided by StatsWales the following table 5 explores the different levels of spending on assessment and care management that local authorities could work towards achieving in Wales. On average Welsh local authorities currently spend 11.1% of their gross adult social care budget on Assessment and Care Management, at £153m annually.

**Table 5: Gross Social Service expenditure<sup>44</sup> in Wales 2013 /14: £1,380m**

<b>Total spend on assessment and care management<sup>45</sup> at:</b>	
8% of expenditure	£110m
10% of expenditure	£138m
11.1% of expenditure (current position in Wales)	£153m
12% of expenditure	£166m
17 % of expenditure	£235m

### **Adult assessments**

#### Cost of an assessment for care and support

The average cost of an assessment for care and support is not currently measured in Wales. As noted above, England and Wales have used the same legislation and the same model for assessment in Social Care. Data from the Health and Social Care Information Centre (HSCIC), together with data provided by StatsWales, have been used to calculate the average cost of Assessment and Care Management in Wales, and the average cost of an assessment for care and support per adult receiving a service in Wales.

<sup>44</sup> Stats Wales – Revenue outturn expenditure: Social Services – 2013/14

<sup>45</sup> Stats Wales - LGFS0015: Social services revenue expenditure by client group (£ thousand)

**Table 6 – The cost of Assessment and Care Management**

	Wales 2013/14	English comparable data (2013/14) <sup>46</sup>
Gross Social Service expenditure (for all adults in Wales, over the age of 18, including carers)	£1,400,000,000 <sup>47</sup>	£17,250,000,000
Gross expenditure for adult cost of Assessment and Care Management <sup>48</sup> (for all adults in Wales, over the age of 18, including carers)	£153,000,000 <sup>49</sup>	£2,070,000,000
Percentage of gross Social Services expenditure used for adult assessment and care management (see text below)	11.1%	12%
The number of adults assessed during the year	96,547 <sup>50</sup>	1,193,540
Estimated cost of assessment and care management per adult receiving a service in Wales	£1,585	£1,734
Assessment representation of assessment and care management cost (see text below)	26%	26%
Estimated cost of assessment	£412	£450

The data available through StatsWales reports details the costs of assessment and care management across authorities and for particular categories of needs. However this data is not separated into the cost of assessment as distinct from care management. To address this question, an approach has been taken to identify the average costs of assessment alone.

Based on the data in table 6 the average expenditure of providing assessment and care management for each individual receiving an assessment in Wales is £1,585<sup>51</sup>. Based on the comparable data of England it is estimated that the expenditure in England represents £1,734<sup>52</sup>.

46 Community Care Statistics, Social Services Activity, England - 2013-14, Final release  
<http://www.hscic.gov.uk/catalogue/PUB16133>

47 Stats Wales –Revenue outturn expenditure – Social Services. <https://statswales.wales.gov.uk/Catalogue/Local-Government/Finance/Revenue/Social-Services/social-services-socialservicesrevenueexpenditure-by-clientgroup> - to the nearest million

48 Assessment and care management - Include costs of commissioning services for older people, specifically the process of receiving referrals, assessing needs, defining eligibility and arranging for packages of care to be provided and reviewing the quality of and continued relevance of that care for older people. This includes field social work costs (including hospital social workers); other social services staff based in primary healthcare settings; occupational therapy services to older people; and relevant support staff costs.

49 Future Paying for Social Care in Wales – LE Wales – 2014 - <https://statswales.wales.gov.uk/Catalogue/Health-and-Social-Care/Social-Services/Adult-Services/Service-Provision/AdultsReceivingServices-by-LocalAuthority-Measure>

50 Stats Wales – CARE0013: Adults assessed and care plans reviewed during the year

51 £153,000,000/96,547

52 £2,070,000,000/1,193,540

The Impact Assessment of the Care Act 2014<sup>53</sup> states that the average cost of assessment is £450. Based on the calculations (Table 6) for England, this cost is 26% of the estimated cost of assessment and care management expenditure of £1,734.

If the same assumptions are applied to the Welsh figures it can be estimated that the average cost of an assessment for care and support per adult receiving a service in Wales is £412 (26% of £1,585).

## **Social worker time**

Research shows that social workers currently spend a great deal of time on administrative work and less time on face to face contact with service users. A UNISON survey indicated that 96% of practitioners felt that too much of their time was spent with paper work. Of those surveyed, 73% felt the time they had available to spend with service users was “insufficient” or “very insufficient”.<sup>54</sup>

Similarly, research from 2003 found that three of the activities most frequently reported by social workers were office-based paperwork relating to caseload, negotiating and arranging social services for users, and completing assessment documentation in the office.<sup>55</sup>

Professor Eileen Munro in her review of Child Protection<sup>56</sup> argued that “There is a need to strip away much of the top-down bureaucracy that previous reforms have put in the way of frontline services. Giving professionals greater opportunity for responsible innovation and space for professional judgment is fundamental if the child protection system is to realise the improvements that have been lacking following previous reforms” and referenced a London School of Economics and Human Reliability evaluation which identified that a reduction of bureaucratic constraints on practice enables practitioners to spend more time (working) with families. Professor Munro also referenced a 2010 study showed that some social workers were spending up to 80 per cent of their time on paperwork but this had developed gradually making it hard for those involved to notice<sup>57</sup>.

## **Option 1: Do the minimum and retain the current approach to assessment**

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53 The Care Act: Impact Assessment number 6107. <http://www.legislation.gov.uk/ukpga/2014/23/impacts>

54 UNISON, Not Waving But Drowning: Paperwork and Pressures in Adult Social Work Services (2009), <http://www.unison.org.uk/acrobat/B4710a.pdf> (last visited 4 April 2011). These figures relate to all social work, not just adult social care. We see no reason to suppose there is a significant difference between child work and adult work.

55 A Weinberg and others, “What Do Care Managers Do? A Study of Working Practice in Older Peoples’ Services” (2003) 33 *British Journal of Social Work* 901, 914.

56 The Munro Review of Child Protection: Final Report A child-centred system - Professor Eileen Munro - Department of Education – May 2011

57 White, S., Wastell, D., Broadhurst, K. & Hall, C. (2010), ‘When policy o’erleaps itself: The ‘tragic tale’ of the Integrated Children’s System’, *Critical Social Policy*, 30, pp405–429.

As illustrated in tables 1 and 2 there is predicted to be a significant rise in the adult population who received social care services by 2030. An assessment cost of £412 (see earlier) has been used to predict the possible increase in expenditure required to provide assessments to the increased population<sup>58</sup>.

**Table 7: Total predicted cost of assessment for all adults receiving social care services**

	<b>Total predicted number of adults receiving local authority social care services (as illustrated in table 3)</b>	<b>Total predicted cost of assessment for all adults receiving social care services</b>
2011	108,818	£44,833,016
2012	111,223	£45,823,876
2013	112,386	£46,303,032
2014	114,151	£47,030,212
2015	116,008	£47,795,296
2030	159,855	£65,860,260

As illustrated in the calculations above the estimated cost of the total amount of assessments for all adults is likely to increase by £19.5m between 2013 and 2030.

Table 5 and the assumptions derived from it, shows that by retaining the current approach to assessment it is expected that 11.1% of gross expenditure on adult social services will be spent on assessment and care management. However, given the predicted large increase in the population of those over the age of 85, there is likely to be a larger proportion of the overall social services budget requiring to be spent on assessment and care management. On this basis, if the current approach to assessment remains, local authorities may need to use larger proportions of the budget in order to provide services to all those that require them. If all local authorities were to spend 17% of their gross spending on adult social care on assessment and care management, this element of the service would have cost an extra £82m across Wales in the year 2013/14.

#### Assessments that did not result in a service

<sup>58</sup> Any financial projections in this Impact Assessment are based on the most recent identified costs - adjustments for inflation have not been taken in to account.



The Community Care Statistics<sup>59</sup> reported that following assessment 65% of adults assessed went on to receive services as a result of their assessment. This means that 35% of assessments did not result in a service being delivered. Under the existing legislative requirement each of those assessments will have been undertaken as full Unified Assessment Process (UAP) assessments. An approach to assessment that is more proportionate to presenting need may tend towards reducing the overall cost of assessment by reducing the costs by anything up to a third of the number of assessments undertaken.

**Table 8: Potential cost savings from assessments that did not result in a service**

	2013/14	2030 (estimated cost)
Average cost of assessment for care and support per adult receiving a service in Wales	£412	£ 412
Total cost of assessments for care and support for all adults receiving a service in Wales (as calculated following Table 7)	£46,303,032	£65,860,260
Potential savings per annum (35% of assessment costs as evidenced by Community Care Statistics)	£16,206,061	£23,051,091

Some local authorities in Wales are seeking to reduce the number of costly UAP assessments (that frequently do not result in a service being provided) by moving to the application of a model of proportionate assessments. However, local authorities' recording of assessments is inconsistent, so this is proving difficult to measure.

If the system remains the same, it can be assumed there will be a continuation of just 65% of adults assessed receiving services as a result of their assessment. As demonstrated in Table 7, over time the amount of assessments will rise, as will the potential cost increase for local authorities.

### Children

Although the data collected for Children's Services is not directly comparable to Adult Services it is likely that there will be similar patterns followed. The census collection for Wales was reported upon in 2011, and the population projections for 2013 and 2030 have been used to make assumptions of the population of those aged 18 years and under.

**Table 9: Number of initial assessments for those aged under 18 years of age**

<sup>59</sup> Community Care Statistics, Social Services Activity, England - 2013-14

	2011	2013	2030
Number of individuals under the age of 18 in Wales <sup>60</sup>	632,433	630,211	652,571
The number of initial assessments that were completed during the year <sup>61</sup>	27,387	27,767	29,155 (estimated).

The Welsh Government's Children in Need Census reported that there were 20,145 children in need at 31 March 2014<sup>62</sup>, which accounts for 3% of the under 18s population in Wales. The data in Table 9 demonstrates that between 2011/12 to 2030 there will be a 3% rise in those living in Wales aged 18 years and under. Therefore, if the approach to assessment remains static, it can be expected that there will be a proportionate rise in the number of children entering the social care system by 2030.

The figures show that there is a 1% rise in the number of initial assessments completed between 2011/12 and 2013/14. If it is assumed that this pattern will continue, in 10 years it can be predicted that there will be a 5% rise in the number of initial assessments completed, which will result in 29,155 assessments by 2030.

There is no data for the costs of children's assessments. Nevertheless an annual 1% increase in assessment costs is likely to be substantial. Given the multi-disciplinary nature of many assessments for children, and the importance of the assessment process in safeguarding the welfare of children, it would be unreasonable to think that an assessment for a child in need would be less costly than the assessment of an adult.

Recent evidence on the Common Assessment Framework (CAF) for children and young people suggests that costs to implement can be a little as £100 through to £8,000 per assessment for more serious, and complex levels of need. The process was in the region of £3,000 in most cases<sup>63</sup>.

Applying the adult costs used in this paper to the process of children's assessments would mean that by 2030 the costs of assessments for children would exceed £12 million – increasing at a rate of over £100,000 per year.

### Carers

Irrespective of the regulations for assessment being introduced, the duty to assess the needs of a carer for support will be placed upon local authorities. The duty is comparable to that used for those for whom carers are providing care, and the Act has removed the existing requirement that the carer must be providing "a substantial amount of care on a regular basis", thereby providing all carers with the right of access to an assessment. This requires that the approach to providing assessments for adult

<sup>60</sup> Stats Wales: 2011 Census: Usual resident population by single year of age and sex, Wales – ((Data for 2011/12 and 2013/14))

<sup>61</sup> Stats Wales: CARE0020: Care Plan/Assessments Summary (Data for 2011/12 and 2013/14)

<sup>62</sup> Stats Wales: Summary of Children in Need data

<sup>63</sup> Taken from: Transitional and longer-term implications of the Social Services and Well-being (Wales) Bill 2013 – Welsh Local Government Association and NHS Confederation – IPC September 2013.

carers who may have needs for support, will need to mirror the approach used for adults who may be in need of care and support.

In Wales, there are 30,000 individuals providing unpaid care<sup>64</sup>. In 2001 it was estimated that in Wales the care that unpaid carers provide would cost £5.69 billion per year to deliver using paid support<sup>65</sup>. If the process for assessing carers' needs for support is not amended to fit with the whole system changed introduced through the Act, it is probable that the consequence will be that many carers, without any support in place, will need the provision of substantial support to meet their own needs following an extensive and bureaucratic assessment that does not emphasise supporting carers through preventative and early intervention approaches,

A similar projection to the ones used above can be used to estimate the rising costs of assessments for carers.

Welsh Government collected data on the number of carers of adults who had an assessment or review of their needs in their own right during the year (first data collection 2008/09). The data shows that there was an increase in carers requesting an assessment following the introduction of the Carers Strategies (Wales) Measure 2010 and this is evidenced in table 10.

**Table 10: Carers assessments**

	2008-09	2009-10	2010-11	2011-12	2012-13	2013-14
Number of carers of adults who had an assessment or review of their needs in their own right during the year	5,484	5,916	6,335	6,978	6,968	7,163
Annual % rise in adults who had an assessments or review of their needs in their own right during the year	NA	8%	7%	10%	0%	3%
Number of carers or adults who were assessed or reassessed in their own right during the year and who were provided with a service	2,281	2,755	3,690	4,298	4,373	4,570
Percentage of carers assessed or reassessed in their own right during the year and who were provided with a service	42%	47%	72%	62%	59%	57%

Based on figures provided by StatsWales<sup>66</sup>, Welsh Government identified that over the six year period (as referred to in table 10) an average 57%, of carers assessed went on to receive services as a result of their assessment. This is broadly consistent with the Community Care Statistics<sup>67</sup> report for adult assessments where it stated that 65% of adults assessed went on to receive services as a result of their assessment. This

<sup>64</sup> Office for National Statistics - 2011 Census: Provision of unpaid care

<sup>65</sup> Carers, Employment and Services in Wales - Carers UK - 2011

<sup>66</sup> Stats Wales - CARE0013: Adults assessed and care plans reviewed during the year – 2013/14

<sup>67</sup> Community Care Statistics, Social Services Activity, England - 2013-14

further demonstrates the similar statistics between Wales and England when both countries operated under the same legal framework.

The percentage increase in the amount of carers completing an assessment or review in their own right is too sporadic to predict future trends. It is likely that the increase in assessments and reviews for carers is due to an increased awareness of carers rights following the introduction of the Carers Strategies (Wales) Measure in 2010/11.

## **Option 2: Create a national system for assessments for both users and carers through regulations**

Under this option Welsh Government considers that there will be long term cost savings as individuals will be supported at an earlier stage through the Information, Advice and Assistance service and through preventative services. Wider access to a more supportive and open system will enable people to get the help they need earlier. As a result fewer individuals will need to have an assessment. This argument is reinforced by the Social Services Improvement Agency (SSIA)<sup>68</sup> report which sets out that early intervention and prevention will help local authorities to meet their savings targets whilst improving outcomes for individuals.

The cost of the current assessment processes is too great. The regulations are designed to support a simplification of the assessment processes and thereby reduce the cost of assessments.

In the last decade the gross expenditure of adult social services has risen by 53%<sup>69</sup>. There is no additional funding available to meet this predicted rise in expenditure should this trend continue. As demand, and service user expectation increases, and budgets are constrained, the current approach to social services has to be redrawn.

### Population Projections

As noted in table 7, the continuing cost of providing social care for adults in Wales is too high, particularly in relation to those estimated to be aged over 85 years, and expected to receive local authority social care services in 2030. The projections currently estimate the number of those aged 85 years and over to increase by 45% between 2013 and 2030.

The proposed approach to assessment that will be introduced through the regulations will recognise that needs can be met not only through support and services provided by the local authority but also through a person's abilities to support themselves or with support from their friends family, and/or preventative, community based services focused on helping people to meet well-being outcomes. Table 2 identified a relatively consistent ratio of 48% of the population over age of 85 years as needing to use directly provided or arranged local authority social care services in the future. The model of

<sup>68</sup> Social Services Improvement Agency – Better Support at Lower Cost - Improving efficiency and effectiveness in services - for older people in Wales - 2011

<sup>69</sup> Stats Wales – Revenue outturn expenditure: Social Services

assessment introduced through the proposed regulations supports a whole system approach that will lower the percentages of the population being supported by such intrusive and expensive provision. It is predicted, therefore, that there can be a reduction in the number of substantial assessments for this population.

The proposed approach to assessment will encourage local authorities to assist individuals to access preventative well-being community based services themselves or support people to develop the skills and confidence they need through early intervention and prevention.

The report to Welsh Local Government Association and NHS Confederation on the transitional and longer-term implications of the Social Services and Well-being (Wales) Bill<sup>70</sup> commented:

“Notwithstanding the potential impact anyway of the likely increase in the numbers of people requiring assessments, due to the projected increase in older people across Wales, there is no reason to assume that changes in assessment requirements will inevitably lead to greater costs in the longer term for local authorities. Indeed, it could lead to downward pressure on overall costs:

- More responsive information services, early support, informal assessments and preventative community support will result in fewer people needing to secure a formal care and support assessment and plan, thus reducing transaction costs.
- Better quality early intervention and prevention services will reduce the need for more costly acute and substitute care”.

### Assessment and Care Management Expenditure

The statistics for community care activity in England<sup>71</sup> show that following assessment 35% of adult assessed did not result in a service being provided. The potential savings from a more responsive, proportionate and efficient assessment process could therefore approach 35% of current assessment costs.

The Audit Commission (2012)<sup>72</sup> reported that the total spend on assessment and care management represented 12% of the gross adult social care budget. It further evaluated that this varied across local authorities, with some local authorities working at 8% spending on Assessment and Care Management. The report evidenced that 8% is an achievable target for local authorities to work to and that it is feasible to reduce expenditure to 8% by streamlining processes, reducing bureaucracy and applying assessment proportionately. As evidenced by the Social Services Improvement

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<sup>70</sup> Transitional and longer-term implications of the Social Services and Well-being (Wales) Bill 2013 – Welsh Local Government Association and NHS Confederation – IPC September 2013.

<sup>71</sup> Community Care Statistics, Social Services Activity, England - 2013-14

47 Value for money in assessments and reviews - Audit Commission –August 2012

Agency (SSIA)<sup>73</sup> early intervention and prevention helps local authorities to meet their savings targets whilst improving outcomes for individuals. The introduction of the regulations will assist local authorities in this agenda, with the likelihood that the spending on assessment and care management will move closer to 8% of the gross expenditure on adult social care.

The data provided in Table 5 demonstrates the cost savings that could be reached if local authorities reduced the expenditure on assessment and care management to 8%. Under option 2 the expectation is that local authorities in Wales would follow this pattern and realise similar efficiencies. If these efficiencies can be met, they could represent savings amounting to £43m in 2013/14, and these costs could be reallocated to the £44m funding gap, as evidenced earlier.

The Association of Directors of Social Services<sup>74</sup> reported that local authorities can meet their savings targets whilst improving outcomes for users by planning to deliver more cost effective services. The report stated that the main approach for achieving such savings is through preventive services focusing on helping people stay out of longer term care, consequently reducing the demand for longer term care.

#### Assessments that did not result in a service

The Community Care Statistics<sup>75</sup> reported that 65% of adults assessed went on to receive services as a result of their assessment. This means that 35% of assessments did not result in a service being delivered.

Some local authorities in Wales are seeking to reduce the number of costly UAP assessments by moving towards the delivery of a model of proportionate assessments. This approach recognises the long term cost savings, that could result from individuals being assessed at an earlier stage e.g. through the Information, Advice and Assistance service.

It is anticipated that the Information, Advice and Assistance Service and preventative services will reduce the number of people needing complex, in-depth assessments as they will be able to access support before they reach crisis point. This earlier intervention will reduce the number of people needing to access managed care and support. Potentially much of the cost of completing the 35% of assessments that currently do not result in a service being delivered can be avoided. This could represent up to £23m in 2030 (as stated in table 8).

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<sup>73</sup> Social Services Improvement Agency – Better Support at Lower Cost - Improving efficiency and effectiveness in services - for older people in Wales - 2011

<sup>74</sup> Better Support at Lower Cost: Improving efficiency and effectiveness in services for older people in Wales - ADSS Cymru – April 2011

<sup>75</sup> Community Care Statistics, Social Services Activity, England - 2013-14

## Children

The new assessment process proposed under Option 2 for children is considered to be in keeping with the assessment process that is currently in place under the Childrens Act 1989. As a result we do not anticipate that costs for children's services will alter significantly. The approach to assessing children's needs through both the regulations and code of practice encourages improved efficiency through streamlined and proportionate assessments. Although there are no negative impacts, it is not possible for Welsh Government to quantify any positive impact.

## Carers

It is anticipated that more carers will be eligible for an assessment under the new legislation. Even so, it is not estimated that the aggregated cost of assessment will increase in direct proportion to the increase in the number of people seeking assessment. It is anticipated that carers will be supported through early intervention, the provision of Information, Advice and Assistance, and preventative services as referred to under the earlier section on adults. This will reduce the number of people needing complex and expensive assessments as they will access support that will prevent or delay a crisis point being reached. This earlier intervention will reduce the number of people needing to access managed care and support.

StatsWales provides data on the number of carers of adults who had an assessment or review of their needs in their own right during the year. This data shows that there was an increase in carers requesting an assessment following the introduction of the Carers Strategies (Wales) Measure 2010.

As evidenced in table 10, and based on figures provided by StatsWales<sup>76</sup>, Welsh Government identified that an average 57% of carers assessed went on to receive services as a result of their assessment between 2008/09 and 2013/14. This may indicate that almost half of carers' assessments are being completed with unnecessary complexity. The figure quoted is broadly consistent with the Community Care Statistics<sup>77</sup> report for adult assessments, as demonstrated above. If this trend continues, there is likely to be a rise in the number of assessments being completed with unnecessary complexity, and in turn resulting in rising costs.

In practice, the proposed system under Option 2 could address the needs of many carers through the initial Information Advice and Assistance service. Carers will be provided with access to relevant, accurate, high quality and timely information, advice and assistance, which may meet their needs without the requirement for a complex, in-depth, UAP-style assessment process. Instead, the assessment process will be applied in a manner that is proportionate to the presenting support needs of the carer.

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<sup>76</sup> Stats Wales - CARE0013: Adults assessed and care plans reviewed during the year – 2013/14

<sup>77</sup> Community Care Statistics, Social Services Activity, England - 2013-14

Following the introduction of the Carers Strategies (Wales) Measure in 2010/11 there was an increase in the number of carers requesting an assessment, presumably due to a sharp rise in people's awareness of their rights as carers. However, there was a significant decrease in the numbers the following year after the first 'wave' of assessment requests had subsided. It is reasonable to assume that the same pattern will occur with the implementation of the Act.



## Annex 2

### Consultation Summary

## **Regulatory Impact Assessment The Care and Support (Assessment) (Wales) Regulations 2015 Annex 2. Consultation**

Welsh Government officials undertook a 12 week consultation on the regulations between 6 November 2014 and 2 February 2015. The consultation on parts 3 and 4 covered assessing the Needs of individuals, eligibility, direct payments and care planning.

As well as being made available to the wider public via the Welsh Government internet pages, the consultation was distributed to:

- Welsh Local Government Association (WLGA)
- The Children’s Commissioner
- The Older People’s Commissioner
- Social Services Improvement Agency (SSIA)
- Local Government representatives
- Third Sector Organisations

The consultation was also distributed more widely through our communications network to ensure full scale coverage of stakeholder and partner organisations. This extensive network includes:

- Local Authorities
- Association of Directors for Social Services Cymru
- Care Council for Wales
- Care and Social Service Inspectorate Wales
- Wales Council for Voluntary Action
- Welsh Local Government Association
- Children in Wales
- Social Services Improvement Agency
- Care Forum Wales

The consultation and engagement process was underpinned from the start by a commitment to working with people to help shape the implementation and deliver the practice and culture change being driven forward through the Act. Many people helped us to develop the policy instructions, regulations and codes of practice on the Social Services and Well-being (Wales) Act. Technical groups were established to discuss and debate and work with Welsh Government to help shape this work. The composition of these groups spanned the care sector and beyond to encompass local authorities, health, voluntary and independent sectors, user led organisations, banks, and youth justice to name just a few.

Discussions were held with the “Alliance of Alliances” – voluntary sector organisations brought together and supported by the WCVA – about the best way to get citizens directly involved to present their views. Officials worked with a broad range of organisations to help bring together people who use services and carers to get their views first hand about what mattered to them and what needed to change.

As well as formal consultation, using various formats, Welsh Government officials gave presentations to groups, held discussions, attended one to one meetings, encouraged people to invite them to their existing meetings, and wrote articles and gave them to our partners to use within their networks. Stakeholders were asked to share information with their networks and feed back to Welsh Government and open offers were made to work directly with people.

The National Social Services Citizen Panel was asked to consider the consultation as individuals within their own networks, but also together as a Panel, where they produced reports to inform the consultation on integration, safeguarding, direct payments and paying for care.

Focus groups were held, with invaluable support from many organisations who brought people together to share their views. These included WCVA, County Voluntary Councils, Children in Wales, Voices from Care, and Community Lives amongst others. Officials spoke about the Act, the Regulations, and the Codes of Practice at meetings and events – for example with local authority social services, health, prisoners and their families, and housing.

As well as key contacts being encouraged to disseminate the consultation documents amongst their networks, to support wider engagement, Easy Read and children and young-people friendly versions were also produced and disseminated.

There were 103 responses received from a variety of stakeholders, a list of respondents is attached at Document 1

A detailed consultation response report will be published on the Welsh Government's website.

Two consultation events were held as part of the consultation process. The purpose was to promote engagement with the consultation and provide a base level of understanding of the areas we were consulting on to key stakeholder groups

Overall the uptake of spaces for the events was positive with capacity reached at both. There were approximately 170 attendees at the event in South Wales and 90 attendees in the North Wales. Document 2 indicates the range of stakeholders represented at these events.

Workshops were held at the events on each of the parts out to consultation. The content of the workshops was varied and tailored to suit the subject matter, but at the core of each was a presentation from officials and group discussions and activities.

### *Key Changes to the Regulations*

The following key amendments were made to the Care and Support (Assessment) (Wales) Regulations 2015, informed by analysis of the consultation responses.

Some respondents felt 'consult' was not a strong enough term when referring to the contribution of specialists to the assessment process. The view was that specialisms were needed for the assessment, and direct contact is required.

The regulations have been strengthened to ensure that

- When carrying out an assessment, a local authority must consider whether the nature of the person's needs call for specialist skills, knowledge or expertise and
- If the local authority considers that specialist skills, knowledge or expertise is required, it must either consult with a person who it considers will be able to provide those skills or that knowledge or expertise , or arrange for the assessment to be carried out by a person with the required specialist skills, knowledge or expertise

The regulations have also been amended to clarify that the requirement to offer a copy of the record of assessment to the person (adult or child) whose needs are being assessed also applies where that person is an adult carer or a child carer whose needs for support are being assessed. A similar clarification has been made to the regulation stating who can request a review of the assessment.

To ensure proper sharing of the record of assessment, amendments have also been made to this regulation to require the local authority, where an adult lacks capacity to be able to request a person to act on their behalf (and where a child lacks this capacity or is not competent to request a person to act on their behalf), and there is no person authorised to act on their behalf, to offer a copy of the record of the assessment to any person who the local authority considers to be acting in the best interests of the adult;

## Doc.1 - List of respondents

No	Confidential Y / N	Name	Organisation/On behalf of
1.	✓		
2.		Fiona Wilke	Individual
3.		Ms Maxine Norrish	Cardiff University RTP student
4.		Gillian Cooper	Cardiff University
5.	✓		
6.		Laura Tuckley	Individual
7.		Charlotte Beare-on behalf of the Hywel Dda Health Board by Dr Phil Kloer	Hywel Dda Health Board
8.		Cheryl Bulman	Individual
9.		Dr Aideen Naughton	Public Health Wales
10.		Ruth Northway	Learning disability advisory group
11.		Zoë Williams	Direct Payments Overview Group
12.		Zoë Williams	All Wales Direct Payments Forum
13.		Beth Evans	Carers Wales
14.	✓		
15.		Gareth Cooke	Torfaen Social Care and Housing

16.		✓	Lynne Doyle -	Neath Port Talbot CBC
17.		✓	Mike Mainwaring	Neath Port Talbot Council for Voluntary Service
18.		✓	Dr Catrin Mair Edwards	SeNSE Cymru
19.		✓	Vin West-	Arfon Access Group
20.		✓	Eve Parkinson -	Welsh Therapy Advisory Committee
21.		✓	Colin Hopwood	Individual
22.		✓	Simon Legg	Spinal Injuries Association
23.		✓	Rachel Williams	Parkinson's UK Cymru
24.	✓			
25.		✓	Ann Acock	Welsh Physiotherapy Leaders Advisory Group
26.	✓			
27.		✓	n/a (Nigel champ - e-mail)	the Chair of the Welsh Medical Committee
28.		✓	Joe Powell	All Wales People First
29.		✓	Hannah Isaacson	Powys Association of Voluntary Organisations
30.		✓	Peter Jones	Guide Dogs Cymru and Blind Children UK Cymru
31.		✓	Natasha Wynne	Marie Curie
32.		✓	Cecile Gwilym	NSPCC Cymru
33.		✓	Peter Martin	Hafal
34.		✓	Meleri Thomas	National Autistic Society Cymru
35.		✓	Tess Saunders,	RNIB CYMRU
36.		✓	Laura Cook	Alzheimer's Society
37.		✓	Liz Majer	Blaenau Gwent County Borough Council
38.		✓	DEBBIE POWELL	SOCIAL CARE IN PARTNERSHIP – SOUTH EAST (SCIPse)
39.		✓	Edwin Jones	LDAG Subgroup - Transforming Care in Wales for people with learning disabilities and challenging behaviour
40.		✓	James Crowe	Learning Disability Wales
41.		✓	Lynne Hughes	MS Society Cymru
42.		✓	Paul Swann / Rick Wilson	Disability Wales / Wales Alliance for Citizen Directed Support Provider Network
43.		✓	Kelly Ball	Newport People First
44.		✓	Alex Perry	Newport People First (trustee)
45.		✓	Allan	Member of Newport People First
46.		✓	Zarah Kaleem	Trustee of Newport People First
47.		✓	Deborah Driffield	City & County of Swansea Social Services
48.		✓	Lola Richards	Cyngor Sir Ynys Mon
49.		✓	No Name	Cyngor Sir Ynys Mon
50.		✓	Jacqueline Davies	CYPP

51.		✓	Ruth Crowder	College of Occupational Therapists
52.		✓	Kieron Rees	Carers Trust Wales
53.		✓	Ruth Crowder	Welsh Reablement Alliance
54.		✓	Ann James	Care Council for Wales
55.		✓	Robin moulster	BASW Cymru
56.		✓	Ruth Coombs	Mind Cymru
57.	✓			
58.		✓	Hywel Ap Dafydd	Children's Commissioner for Wales
59.		✓	Dr Sam Clutton	Barnardos Cymru
60.	✓			
61.		✓	Caroline Hawkings	Scope Cymru
62.		✓	Judith Brooks	Bridgend County Borough Council
63.		✓	Catherine Manning	British Red Cross
64.		✓	Philippa Ford	CSP
65.		✓	Holly Towell	Headway
66.		✓	Bethan Jones Edwards	North Wales Social Services Improvement Collaborative
67.		✓	Alice Southern	Alzheimer's Society
68.		✓	Dusty Kennedy	Youth Justice Board
69.		✓	Ian Thomas	Citizens Advice Cymru
70.		✓	Nicola Evans	Older People's Commissioner for Wales
71.		✓	Jenny Williams	Conwy County Borough Council
72.		✓	Catherine Poulter	Carmarthenshire County Council
73.		✓	Ele Hicks	Diverse Cymru
74.		✓	Erin Rodgers	The Disabilities Trust
75.		✓	Giovanni Isingrini	ADSS Cymru
76.		✓	Sue O'Grady	Powys CC
77.		✓	Paul Apreda	FNF Both Parents Matter Cymru
78.		✓	Suzanne Griffiths	National Adoption Service
79.		✓	Catherine Lewis	North Wales Disabled Children Social Services Managers Network
80.	✓			
81.		✓	Dominic Carter	UK Homecare Association
82.		✓	Catherine Lewis	North Wales Disabled Children Social Services Managers Network
83.		✓	Sian Walker, Tony Young	Cardiff Council
84.	✓			
85.		✓	Martyn Palfreman	Mid and West Wales Health and Social Care Collaborative
86.		✓	Rosanne Palmer	Age Cymru
87.		✓	Gill Paul	Gwynedd Council
88.		✓	Michael Nicholson	Newport County Council
89.		✓	Mair Kromei	Hywel Dda Health Board

90.	✓	Iola Richards	Cyngor Sir Ynys Môn
91.	✓	Judith Brooks	Bridgend County Borough Council
92.	✓	Phil Evans	Vale of Glamorgan
93.	✓	Owen Williams	Wales Council of the Blind
94.	✓	Judith Hall	CSSIW - National Advisory Board
95.	✓	Sara Harvey	Western Bay Programme
96.	✓		Voices from Care Cymru
97.	✓	Roger Bishop	All Wales Children and Young Persons Advocacy Providers Group
98.	✓	Katie Dalton	Gofal
99.	✓	Marshall Phillips	Wales Sub -Committee of Association of HM District Judges
100.	✓	Bobby Bolt	Aneurin Bevan University Health Board
101.	✓	Catrin Edwards	Sense Cymru
102.	✓		Carers Wales
103.	✓	Anselm Benedict	Law Society

## Doc.2 - List of stakeholders at consultation events

No	Name		Organisation/On behalf of
1	Bryony	Hughes	
2	Lewis	Rachel	Age Alliance Wales
3	Palmer	Rosanne	Age Alliance Wales
4	Young	Kate	All Wales Forum of Parents and Carers of People with Learning Disabilities (AWF)
5	Pearse	John	All Wales People First
6	Slater	Lin	Aneurin Bevan University Health Board
7	Southern	Tim	Ategi - Shared Lives Services
8	Lesley	Cotter	Betsi Cadwaladr University Health Board
9	Michelle	Denwood	Betsi Cadwaladr University Health Board
10	Wendy	Hooson	Betsi Cadwaladr University Health Board
11	Eleri	Lloyd-Burns	Betsi Cadwaladr University Health Board
12	David	O'Brien	Betsi Cadwaladr University Health Board
13	Sue	Owen	Betsi Cadwaladr University Health Board
14	Barry	Starter	Betsi Cadwaladr University Health Board
15	Diamond	Phil	Blaenau Gwent County Borough Council
16	Evans	Tanya	Blaenau Gwent County Borough Council
17	Hoskins	Alyson	Blaenau Gwent County Borough Council
18	Jones	Sarah	Blaenau Gwent County Borough Council
19	Tyrrell	Heather	Blaenau Gwent County Borough Council
20	Bowen	Fay	Bridgend County Borough Council
21	Bracey	Avril	Bridgend County Borough Council
22	Bradshaw	Adrian	Bridgend County Borough Council



23	Donovan	Carmel	Bridgend County Borough Council
24	Harris	Mike	Bridgend County Borough Council
25	Hughes	Tracy	Bridgend County Borough Council
26	Hutchinson	Jane	Bridgend County Borough Council
27	Morgan	Jaci	Bridgend County Borough Council
28	Morgan	Louise	Bridgend County Borough Council
29	Owen	Carol	Bridgend County Borough Council
30	Pickrell	Scott	Bridgend County Borough Council
31	Roche	Emma-Jayne	Bridgend County Borough Council
32	Silcox	Natalie	Bridgend County Borough Council
33	Warrilow	Terri	Bridgend County Borough Council
34	Wyatt	Tony	Bridgend County Borough Council
35	Fowler-Powe	Michelle	British Deaf Association
36	Blake	Tina	Caerphilly County Borough Council
37	Davies	Carol A	Caerphilly County Borough Council
38	Davies	Denise	Caerphilly County Borough Council
39	Daye	Viv	Caerphilly County Borough Council
40	Edwards	Janine	Caerphilly County Borough Council
41	Howells	Stephen	Caerphilly County Borough Council
42	Lock	Sion	Caerphilly County Borough Council
43	Powell	Karen	Caerphilly County Borough Council

44	Rogers	Michaela	Caerphilly County Borough Council
45	Street	Dave	Caerphilly County Borough Council
46	Thomas	Dave	Caerphilly County Borough Council
47	White	Deborah	Caerphilly County Borough Council
48	Williams	Steph	Caerphilly County Borough Council
49	Wright	Sue	Caerphilly County Borough Council
50	Morris	Cerys	Cambian Healthcare
51	Martin	Christine	Cardiff Metropolitan University
52	Roberta	Hayes	Care Council for Wales
53	Sheila	Lyons	Care Council for Wales
54	Ian	Thomas	Care Council for Wales
55	Ceri	Williams	Care Council for Wales
56	Griffith	Stephanie	Care Council for Wales
57	Wakelin	Karen	Care Council for Wales
58	Rees	Kieron	Carers Trust Wales
59	Bowen	Keith	Carers Wales
60	Edwards	Neil	Carmarthenshire County Council
61	Jackman	Noreen	Carmarthenshire County Council
62	James	Bethan T	Carmarthenshire County Council
63	Meredith	Jayne	Carmarthenshire County Council
64	Smith	Stefan	Carmarthenshire County Council
65	Thomas	Noeline	Carmarthenshire County Council
66	Thomas	Jayne	Carmarthenshire County Council
67	Sian	Howys	Ceredigion County Borough Council
68	Carys	James	Ceredigion County Borough Council

69	Amanda	Jones	Ceredigion County Borough Council
70	O'Rourke	Judi	Ceredigion County Borough Council
71	Lewis	Catherine	Children in Wales
72	Martin	Cheryl	Children in Wales
73	Curtis	Emma	City and County of Swansea
74	Williams	Allison	City and County of Swansea
75	Denise	Moriarty	City of Cardiff Council
76	Bourge	Angela	City of Cardiff Council
77	Cole	Andy	City of Cardiff Council
78	David	Geraldine	City of Cardiff Council
79	Felvus	Jan	City of Cardiff Council
80	Finch	Jo	City of Cardiff Council
81	George	Ceri	City of Cardiff Council
82	Griffiths	Menai	City of Cardiff Council
83	Hoey	Jane	City of Cardiff Council
84	James	Natasha	City of Cardiff Council
85	Madell	Finn	City of Cardiff Council
86	Miller	Sharon	City of Cardiff Council
87	Osbourne	Matt	City of Cardiff Council
88	Reed	Julie	City of Cardiff Council
89	Schelewa	Susan	City of Cardiff Council
90	Teague	Siobhan	City of Cardiff Council
91	Tonkinson	Ceri	City of Cardiff Council
92	Westwell	Sally	City of Cardiff Council
93	Crowder	Ruth	College of Occupational Therapists
94	Kate	Davenport	Conwy County Borough Council
95	Anne	Flanagan	Conwy County Borough Council
96	Hannah	Fleck	Conwy County Borough Council
97	Tesni	Hadwin	Conwy County Borough Council
98	Marian	Hankin	Conwy County Borough Council
99	Marie	Jones	Conwy County Borough Council
100	Claire	Lister	Conwy County Borough Council

101	Jenny	Williams	Conwy County Borough Council
102	Erica	Wynn Roberts	Conwy County Borough Council
103	Jennie	Lewis	CSSIW
104	Vicky	Poole	CSSIW
105	Marc	Roberts	CSSIW
106	Davies	Donna	CSSIW
107	Glynn Jones	Sarah	CSSIW
108	Huws-John	Gill	CSSIW
109	Redman	Ken	CSSIW
110	Young	Katie	CSSIW
111	Lewis	Lyndon	Cym Taf YOS
112	Townsend	Oliver	Cymorth Cymru
113	Gareth	Llwyd	Cyngor Sir Ynys Mon
1	Vicky	Allen	Denbighshire County Council
2	Maria	Bell	Denbighshire County Council
3	Cathy	Curtis-Nelson	Denbighshire County Council
4	Joanna	Driver	Denbighshire County Council
5	Melanie	Evans	Denbighshire County Council
6	Phil	Gilroy	Denbighshire County Council
7	Gwynfor	Griffiths	Denbighshire County Council
8	Vanessa	Kyte	Denbighshire County Council
9	Sandra	Naughton	Denbighshire County Council
10	Stephanie	O'Donnell	Denbighshire County Council
11	Alaw	Pierce	Denbighshire County Council
12	Bethan	Wyn Roberts	Denbighshire County Council
13	Swann	Paul	Disability Wales
14	Ffion	Alun	Estyn Llaw
15	Christine	Duffy	Flintshire County Council
16	Susie	Lunt	Flintshire County Council
17	Saunders	Lisette	G4S Custodial & detention Services, YMP &YOI Parc

18	David	Nulty	Glyndwr University
19	Dalton	Katie	Gofal
20	Laurent	Louisa	Greater Gwent Transformation Project
21	Sara	Lloyd Evans	Gwynedd & Anglesey Local Safeguarding Children's Board
22	Stephen	Wood	Gwynedd Mon YJS
23	Morwena	Edwards	Gwynedd CBC
24	Olwen	Ellis Jones	Gwynedd CBC
25	Nerys	Evans	Gwynedd CBC
26	Iona	Griffith	Gwynedd CBC
27	Meilys	Heulfryn Smith	Gwynedd CBC
28	Marian	Hughes	Gwynedd CBC
29	Glenda	Lloyd Evans	Gwynedd CBC
30	Gwenno	Williams	Gwynedd CBC
31	Martin	Peter	Hafal
32	Maggs	Dave	Headway
33	Phillips	Marie	HMP Swansea
34	Toohey	Karen	Hywel Dda Health Board
35	Dawson	Rhian	Hywel Dda UHB/ Carms CC
36	Iola	Richards	Isle Of Anglesey County Council
37	Sian	Owen	Learning Disability Wales
38	Kevin	Sibbons	Learning Disability Wales
39	Karen	Warner	Learning Disability Wales
40	Sutherns	Alan	Learning Disability Wales
41	Allen	Angela	Merthyr Tydfil CBC
42	Anderton	Mark	Merthyr Tydfil CBC
43	Beckham	Alex	Merthyr Tydfil CBC
44	Bow	Jill	Merthyr Tydfil CBC
45	Cawley	Mike	Merthyr Tydfil CBC
46	Davies	Jonathan	Merthyr Tydfil CBC
47	Edevane	Angela	Merthyr Tydfil CBC
48	Eyre	Jon	Merthyr Tydfil CBC
49	Hughes	Sue	Merthyr Tydfil CBC
50	Jayne	Michelle	Merthyr Tydfil CBC
51	Jones	Alyson	Merthyr Tydfil CBC
52	Lipian	Pauline	Merthyr Tydfil CBC
53	O'Keefe	Kathryne	Merthyr Tydfil CBC
54	Powell	Gareth	Merthyr Tydfil CBC
55	Preece	Sue	Merthyr Tydfil CBC
56	Rees	Lowri	Merthyr Tydfil CBC

57	Rush	Christina	Merthyr Tydfil CBC
58	Owen	Arabella	Mid and West Wales Health and Social Care Collaborative
59	Palfreman	Martyn	Mid and West Wales Health and Social Care Collaborative
60	Smith	Sarah	Ministry of Justice
61	Carter	Joseph	MS Society Cymru
62	Pearce	Rebecca	MS Society Cymru
63	Andy	Jones	National Probation Service - Wales
64	Donovan	Bethan	Neath Port Talbot CBC
65	Doyle	Lynne	Neath Port Talbot CBC
66	Hinton	Amanda	Neath Port Talbot CBC
67	Kneath	Jayne	Neath Port Talbot CBC
68	Marchant	Claire	Neath Port Talbot CBC
69	Williams	Pauline	Neath Port Talbot CBC
70	Bowler	Peter	Newport City Council
71	Close	Tracey	Newport City Council
72	Davies	Ceri	Newport City Council
73	Davies	Julie	Newport City Council
74	Hughes	Nicola	Newport City Council
75	Jenkins	Sally	Newport City Council
76	Richardson	Katrina	Newport City Council
77	Taylor	Amii	Newport City Council
78	Thomas	Julia	Newport City Council
79	Jones	Elfed	NOMS HMP Prison Service
80	Gawthorpe	Aine	NOMS in Wales
81	Graham	Opie	North Wales Police
82	Gabrielle	Heeney	North Wales Social Services Improvement Collaborative
83	Bethan	Jones Edwards	North Wales Social Services Improvement Collaborative
84	Bartley	Stephen	Older People's Commissioner for Wales
85	Evans O'Brien	Catherine	Older People's Commissioner for Wales
86	Ruth	Ingram	Powys County Council
87	Anderson	Lee	Powys County Council
88	Jeffreys	Jen	Powys County Council
89	Jukes	Hazel	Powys County Council
90	Self	Keith	Powys County Council

91	Pauline	Galluccio	Powys Teaching Health Board
92	Day	Sarah	Practice Solutions
93	Kate	McDonald	Public Health Wales
94	Rachel	Shaw	Public Health Wales
95	Angela	Tinkler	Public Health Wales
96	Evans	Janet	Public Health Wales
97	Smith	Gloria	Public Health Wales
98	Bately	Ann	Rhondda Cynon Taf CBC
99	Bridgman	Luisa	Rhondda Cynon Taf CBC
100	Clark	Julie	Rhondda Cynon Taf CBC
101	Gatis	Bob	Rhondda Cynon Taf CBC
102	Harris	Mark	Rhondda Cynon Taf CBC
103	Holloman	Gail	Rhondda Cynon Taf CBC
104	Jones	Gail	Rhondda Cynon Taf CBC
105	Neale	Jackie	Rhondda Cynon Taf CBC
106	Nichols	Sara	Rhondda Cynon Taf CBC
107	Pearce	Liz	Rhondda Cynon Taf CBC
108	Preston	Jayne	Rhondda Cynon Taf CBC
109	Williams	Alexis	Rhondda Cynon Taf CBC
110	Williams	Claire	Rhondda Cynon Taf CBC
111	Saunders	Tess	RNIB Cymru
112	Ian	Bottrill	Safeguarding Advisory Board
113	Edwards	Catrin	Sense Cymru
114	Hayes	Melanie	Shine Cymru
115	Cooke	Catherine	South Wales Police
116	Penhale	Lian	South Wales Police
117	Baker	Melanie	Torfaen County Borough Council
118	Davies	Kevin	Torfaen County Borough Council
119	Eva	Catherine	Torfaen County Borough Council
120	Evans	Maria	Torfaen County Borough Council
121	Hopkins	Howard	Torfaen County Borough Council
122	Jones	Eunice	Torfaen County Borough Council
123	Newman	Joanne	Torfaen County Borough Council
124	Orford	Peter	Torfaen County Borough Council

125	Thole	Adrian	Torfaen County Borough Council
126	Watkins	James	Torfaen County Borough Council
127	Williams	Zoe	Torfaen County Borough Council
128	Williams	Richard	Torfaen County Borough Council
129	Jenny	Burgess	Unique Transgender Network
130	Dominic	Carter	United Kingdom Home Care Association
131	Randell	Peter	United Kingdom Home Care Association
132	Betteridge	Joanne	Vale of Glamorgan Council
133	Evans	Rachel	Vale of Glamorgan Council
134	Jones	Gaynor	Vale of Glamorgan Council
135	Poole	Nichola	Vale of Glamorgan Council
136	Vin	West	Wales Alliance for Citizen Direct Support
137	Rob	Wilson	Wales Alliance for Citizen Direct Support (The Rowan Organisation)
138	Meloy	Ceri	Wales Alliance for Citizen Directed Support
139	Judith	Magaw	Wales Community Rehabilitation Company
140	Magaw	Judith	Wales Community Rehabilitation Company
141	Owen	Williams	Wales Council for the Blind
142	Elizabeth	Thornburn	Wales Council for Voluntary Action
143	Davies	Alison	Welsh Ambulance Service
144	Tim	Griffiths	Welsh Ambulance Services NHS Trust
145	Hewitt	Gareth	Welsh Government
146	Sarah	Laing	Welsh Government:
147	Williams	Hannah	Welsh Government: Children, Young People and Families
148	Temple-Williams	Heather	Welsh Government: Community Safety Division
149	Gear	Stephen	Welsh Government: Dept for Education & Skills



150	Sharples	Jacqui	Welsh Government: Dept for Education & Skills
151	Gareth	John	Welsh Government: DHSS
152	Evans	Nicola	Welsh Government: DHSS
153	Owen	Rob	Welsh Government: Housing and Regeneration
154	Prothero	Simon	Welsh Government: Housing and Regeneration
155	Alleyne	Naomi	Welsh Local Government Association (WLGA)
156	Blythe	Stewart	Welsh Local Government Association (WLGA)
157	Elaine	Blease	Wrexham CBC
158	Ann	Chadd	Wrexham CBC
159	Ruth	Davies	Wrexham CBC
160	Sheila	Finnigan-Jones	Wrexham CBC
161	Annette	Green	Wrexham CBC
162	Mark	Jones	Wrexham CBC
163	Margaret	Sloan	Wrexham CBC
164	Cressida	Travis	Wrexham CBC
165	Charlotte	Walton	Wrexham CBC
166	Jo	Ward	Wrexham CBC
167	Steve	Williams	Wrexham CBC
168	Cooper	Sarah	Youth Justice Board Cymru