

Cynulliad Cenedlaethol Cymru  
Bil Awtistiaeth (Cymru) drafft  
Ffurflen Hawdd ei Darllen DAB32  
Ymateb gan Cymdeithas Seicolegol  
Prydain

National Assembly for Wales  
Draft Autism (Wales) Bill  
Easy Read DAB32  
Evidence from British Psychological  
Society

## About the Society

The British Psychological Society, incorporated by Royal Charter, is the learned and professional body for psychologists in the United Kingdom. We are a registered charity with a total membership of just over 50,000.

Under its Royal Charter, the objective of the British Psychological Society is "to promote the advancement and diffusion of the knowledge of psychology pure and applied and especially to promote the efficiency and usefulness of members by setting up a high standard of professional education and knowledge". We are committed to providing and disseminating evidence-based expertise and advice, engaging with policy and decision makers, and promoting the highest standards in learning and teaching, professional practice and research.

The British Psychological Society is an examining body granting certificates and diplomas in specialist areas of professional applied psychology.

## Publication and Queries

We are content for our response, as well as our name and address, to be made public. We are also content for the NAW to contact us in the future in relation to this inquiry.

Please direct all queries to:-

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## About this Response

The response was led on behalf of the Society by:

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With contributions from:

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Please refer to questions in the [Easy Read Response Form](#).

Question	Answer
01	No
02	Not Sure
03	No
04	Yes
05	The Society believes that this is a timely response to write the autism strategy and welcomes this. However, we believe that it is essential that all key stakeholders, most importantly service users with ASD, are consulted with including health boards, the criminal justice system, children & young families, professionals and community services.
06	A timely response to write the guidance is supported. However, it will be important that stakeholders are involved in discussions to prepare guidance in line with existing policies and strategies. This is to ensure that the guidance is supporting service delivery.
07	The Society believes that the time frame is appropriate but there will need to be a specified time frame for services to implement and develop services in line with the strategy.
08	Yes
09	Yes
10	Yes
11	<p>The Society believes the guidance should provide more examples of the professionals needed to undertake a comprehensive assessment. However, additional professionals that could form part of the assessment team, when appropriate, include:</p> <ul style="list-style-type: none"> <li>- Paediatricians</li> <li>- Education</li> </ul> <p>Other people that we need to ensure are part of the assessment process include:</p> <ul style="list-style-type: none"> <li>- Advocacy</li> <li>- Families</li> </ul>
12	<p>The Society would point to the following factors:</p> <ul style="list-style-type: none"> <li>- Lack of appropriate advocacy support.</li> <li>- A lack of appropriately trained staff to carry out comprehensive assessments - this may lead to delays and/or impact on the quality of assessments.</li> <li>- Do all areas within Wales have adequate provision of services?</li> <li>- Lack of understanding and awareness of the needs of people with ASD, for example in schools, the criminal justice system,</li> </ul>

	<p>employment services, health and LA services, needs to be addressed.</p> <ul style="list-style-type: none"> <li>- Financial constraints/pressures that impact on the provision of services.</li> <li>- Lack of positive, person centred approaches based on understanding the individual's strengths and what is important 'to' and 'for' the individual.</li> <li>- Those in custody or supervised by probation in Wales are likely to struggle to access appropriate services due to their complex needs and risk management concerns.</li> <li>- The lack of reliable and validated screening within forensic/education settings is likely to be a barrier to accessing appropriate diagnostic services.</li> <li>- The lack of a clear referral process for those individuals in custody.</li> </ul> <p>Current service provision for those with an ASD diagnosis is managed through Learning Disability services OR Mental Health services. Therefore, some individuals are denied access to services based on IQ (too high or too low) or lack of co-morbid mental health conditions.</p> <p><b>All community and inpatient services should have the skills in supporting people with ASD. Access should be based on the individual's needs, wishes and presenting risks.</b></p>
13	<p>Yes</p> <p>In addition, it should say what the data will be used for.</p>
14	<p>The Society believes that this is dependent on the purpose of gathering this information.</p> <p>If it is about patterns of prevalence, then information on:</p> <ul style="list-style-type: none"> <li>- Person's age</li> <li>- Gender</li> <li>- Ethnicity</li> <li>- Age they were when they got diagnosed</li> <li>- Birth history</li> <li>- Any other additional needs</li> </ul> <p>If it is about clarifying the assessment / intervention process and ensuring equitable access, then information on:</p> <ul style="list-style-type: none"> <li>- Date of referral for assessment</li> <li>- Date of diagnosis or discharge</li> <li>- How they were diagnosed</li> <li>- Access to services and interventions post-diagnosis</li> <li>- Qualitative feedback from service users on the process</li> </ul>

15	It should be written in the guidance. It should just be used to help.
16	Not Sure
17	It should happen all the time.
18	<p>The Society would point to the following factors:</p> <ul style="list-style-type: none"> <li>- There is no mention of Welsh language – this needs to be considered in all aspects</li> <li>- It will be beneficial for all organisations to have clarity on their duties around the implementation of the strategy</li> <li>- It will be beneficial to those involved with the criminal justice system if arrangements for services are clearly defined and referral processes clearly identified, this is particularly important for those detained within the prison system.</li> <li>- Consideration needs to be given to increasing training opportunities for all services who will support people with ASD including those working within community and inpatient learning disability and generic mental health services, primary health and primary mental health services, those working within the criminal justice system and those working within education and employment services.</li> <li>- Clarification on whether the implementation of this strategy will incur cost (i.e. training, awareness) and if so, whether or not the cost implications have been balanced against potential long term benefits. (Knapp et al., 2009).</li> </ul>
19	<p>The Society has the following comments:</p> <ul style="list-style-type: none"> <li>- The assessment process needs to take place in a range of different contexts and at a range of different times</li> <li>- To ensure appropriate advocacy services are involved in supporting individuals throughout the process of diagnosis, assessment, intervention and to ensure access to services</li> <li>- Given the possibly limited numbers of staff currently trained in diagnostic assessment there will need to be investment in training if specific professionals are expected to be part of the assessment team.</li> <li>- Improved screening tools within services that do not have access to a multidisciplinary team (e.g. probation, education) which would then lead to appropriate access to the Health / LA assessment team</li> <li>- Improved joint working between the many different organisations and services involved in supporting people with ASD – a co-ordinated rather than fragmented service response</li> <li>- The Bill and statutory guidance needs to address the gaps in service provision for people with ASD that is often based on diagnostic thresholds. All community and inpatient services</li> </ul>

	<p>should have the skills in supporting people with ASD. Access should be based on the individual's needs, wishes and presenting risks.</p> <ul style="list-style-type: none"><li>- Training needs to be provided at all levels of service provision in order for the implementation of the Bill to be successful.</li><li>- The HMPPS ASD Working group in Wales should be consulted to ensure appropriate guidance and referral processes to local authorities and the NHS are in place.</li><li>- To develop appropriate resources and funding to ensure that the potential cost implications of the ASD Bill are met.</li><li>- To ensure that the screening/ assessment processes adhere to the NICE guidelines (NICE, 2015)</li><li>- The guidance needs to take into account the current work being completed by the Neurodevelopmental Diagnostic Assessment pathway - T4CYP2015 (Neurodevelopment Diagnostic Assessment Pathway, 2015).</li></ul>
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## References

Knapp M., Romeo R. & Beecham J. (2009) Economic cost of autism in the UK. *Autism*, 13(3), 317-336 DOI: [org/10.1177/1362361309104246](https://doi.org/10.1177/1362361309104246)

Quality Standard Autism [QS51] (2015) NICE  
<https://www.nice.org.uk/guidance/qS51>

Neurodevelopment Diagnostic Assessment Pathway (T4CYP) (2015)  
<http://www.asdinfo.wales.co.uk/children>