

Rebalancing care & support consultation response: Community Housing Cymru & Cymorth Cymru

August 2023

About us

Community Housing Cymru (CHC) is the voice of housing associations in Wales, representing and supporting 36 housing associations and community mutuals. Cymorth Cymru is the representative body for homelessness and support services in Wales and advocates on behalf of over 80 organisations.

CHC and Cymorth have prepared this joint consultation response on behalf of our care and support providing members to highlight the contribution that not-for-profit housing associations and third sector providers make to the health, care and support ecosystem.

The social housing and third sector support sector has a longstanding reputation of demonstrating excellent innovation, collaboration and partnership working to find solutions to problems in sometimes difficult operating environments. Housing associations and housing support providers are firmly rooted in communities and are therefore very well placed to deliver high quality care and support solutions tailored to the people that they serve.

Key messages

- Housing associations and third sector support providers are keen to play their full part in health, social care and support eco-systems, as an equal partner in commissioner/service delivery partnerships.
- We welcome the Welsh government's ambition to focus on the long term vision, as difficult as that can be during periods of crisis. However, we must ensure that policy change recognises the challenges currently facing care and support providers and, where necessary, provides the urgent measures needed to stabilise the sector.
- We note this consultation includes a focus on the workforce and share the view that a strong, skilled workforce will be critical to delivering these policy ambitions. We have concerns about the voluntary nature of the proposed Pay and Progression Framework and urge the Welsh government to fully consider any unintended consequences that may arise from the framework before progressing.



- We are broadly supportive of developing a National Office for Care but stress that careful thought and consideration must be given to how this Office can enhance existing practice and not over-complicate an already highly regulated and under-resourced sector.
- The scale of this consultation and the changes it proposes requires an appropriately robust training programme.

Our response

The [Rebalancing Care and Support White paper](#) produced by the Welsh government emphasised that funding was the 'biggest challenge facing the social care sector in Wales'. We welcome this consultation as recognition from the Welsh government that significant, swift progress must be made to protect the viability of care and support services throughout Wales. The pressures on the sector have been such that it is now very unstable and fragile, having lost much of its resilience; we believe that the sector will need rebuilding, as well as rebalancing.

The scale of the consultation compared to the relatively short consultation time has impacted upon stakeholders' capacity to consider the changes at the necessary depth. There has also been a lack of clarity about the scope of the consultation, with some organisations interpreting it to cover all care and support including non-regulated services, but others considering it to apply to only services registered with and regulated by CIW. We would urge that these parameters are explicitly defined to avoid confusion inside and outside of the sector. We note that the [Social Services Wellbeing Wales Act 2014 \(SSWBA\)](#) asserts that the care and support system is wider than just regulated services.

Part 8 - Code of Guidance - The National Framework for Commissioning Care

Q.1. Do you think the principles and standards set out in the Code will help to ensure Wales-wide consistency in commissioning processes and practice and reduce duplication and complexity

Consistency across commissioning is key to streamline services, ensure workers are paid equitably and guarantee that individuals have access to care and support services irrespective of the local authority area they reside in. We welcome the Welsh government's ambition to implement a framework that works towards these goals.

Principles

Our members have commented that there are already several principles that underpin the Social Services and Wellbeing (Wales) Act 2014, which are very well intentioned but not necessarily applied consistently or effectively across Wales (these are: Well-being, Voice and Control, Prevention and Early Intervention, Co-production, Multi-agency). Therefore, consideration must be given to how we ensure that the principles in the National Framework are put into practice and how local authorities and health boards are both supported and accountable in doing this.



Practice guidance may well be useful in supporting this to become and remain a reality. With public finances under huge pressure, it is important that decisions that appear to save money in the long term do not lead to poorer outcomes. Our members who deliver Learning Disability Supported Living services are particularly keen to ensure that funding pressures do not hinder or reverse progress we have made in embracing smaller, more person-centred models of care and support that retain people's independence and promote their human rights.

Some members have highlighted that these principles and standards could be extremely challenging to deliver. While a code of practice to provide some consistency to commissioning is very much welcomed, it should not jeopardise areas of best practice or restrict bespoke and specific service design that reflects the local needs of diverse communities throughout Wales. Service providers operate in a variety of different communities throughout Wales (for example, urban, valley and rural), and tailor services to meet the diverse needs of the people living there. This framework must recognise that the services required in these different locations can differ vastly and therefore an element of individualism must be retained.

The paragraphs below outline our specific feedback on the seven principles the framework introduces:

1. Relationships matter

We are wholly supportive of this principle. Robust, respectful and compassionate relationships between local authorities, housing associations and third sector providers are crucial. Housing associations and third sector organisations are essential partners that enable local authorities and health boards to deliver their care and support duties. Therefore, positive and equitable relationships must also be accompanied by support and appropriate resourcing for providers to continue to deliver high quality services and support their workforce. There must be recognition of the expertise housing associations and third sector organisations can contribute to achieve common strategic goals, resulting in better outcomes for individuals accessing those services. We believe it would be helpful to define co-production within the National Framework so that there is a shared understanding of what this entails.

2. Effective leadership is inclusive, transparent and honest

We believe that this principle would benefit from some clarification, as it currently risks combining two different matters: leadership on one hand, and data and evidence on the other. We would suggest adding the latter to Principle 7 and focusing Principle 2 on strong leadership that is responsive and resilient to the challenging external environment as well as proactive with the ability to horizon scan and focus on prevention.

It would be helpful if this section was clearer about what it means by the word 'leaders' - does this mean elected members, senior leaders within local authorities, and/or leaders within commissioning teams? We would strongly support an approach that recognises that leaders can operate at many parts of a commissioning organisation, and that inclusive, transparent and honest leadership should be encouraged at all levels.



Essential to effective leadership is transparent decision-making, recognising the importance of being open and honest when routinely making challenging decisions that have a significant impact on the lives of everyday people. We must also promote equity between leaders and frontline staff; commissioners and support providers; and organisations and people using social care services.

Finally, we also think it is important to resource good quality leadership within commissioning bodies. If we want our leaders to be visible to people, communities and care providers; to proactively nurture relationships with service providers in their locality or region; and to commission services effectively, then they need to have the capacity, expertise and resources to do so.

3. Collaboration: share risks, resources and assets

We support the principle of collaboration, but feel that the language to describe this principle focuses too much on risk rather than supporting and enabling good quality collaboration. We believe that commissioners must prioritise creating enabling environments, identifying opportunities for collaboration and recognising the lack of resources within the sector in terms of time and funding.

It is also important to acknowledge that competitive commissioning processes and environments can sometimes hinder collaboration and the sharing of resources. We need to fully recognise that commissioning processes can themselves introduce risk and uncertainty for commissioners, service providers and service users. We would like to see more in this principle around how commissioners can create environments and processes that better support and enable collaboration so that citizens can access the best possible care and support

Whilst there needs to be an element of challenge between commissioners and service providers, it is equally important that housing associations and third sector providers feel supported by commissioners when they are dealing with difficult situations. Risk must be shared between commissioners and service providers proportionately and responsibly.

From a housing perspective, it would also be useful to see reference to how investment in capital can support collaboration and enable longer term planning, as well as ensuring that revenue funding is available to ensure projects are sustainable in the long term.

4. Value 'what matters'

CHC and Cymorth fully agree with defining value as being more than cost, and absolutely support the view that not-for-profit housing associations and third sector providers can and do add substantial social value. However, this must be recognised and reflected in fair pay for fair work.

We suggest that the phrase 'What matters' is replaced with an alternative, as this risks being confused with the 'What matters' conversations that social care providers have with people using services.



5. Sustainable care and support is built on fair work and fair pricing

We are fully supportive of this principle, hence our reference to fair work throughout this consultation response. Fair work needs to run throughout our social care policy and legislation to ensure that commissioners are able to offer sufficient fees, so that providers can pay their staff properly. Our members stress the importance of fees maintaining any future increases of the Real Living Wage and associated differentials.

We would welcome the addition of references to the provision of employee support, training, progression and reflective practice into the description to emphasise the holistic approach to Fair Work.

6. Plan for current need and future generations

We fully support the intention to plan for both current need and future generations, and believe that collaboration with social housing and third sector support providers will be essential to achieving this. Our members are very keen to be involved in conversations with commissioners as early as possible to ensure that all partners understand what is coming down the line in terms of population needs assessments and planning for future service provision. They are very supportive of encouraging commissioners to think longer term and stress the importance of co-production with the third sector, with a particular focus on ensuring there is both the capital development and workforce planning that is fit for the future.

We must maximise the potential return of the resources we have available. To ensure we are able to do this, there must be appropriate involvement across Welsh government, local authorities and third sector organisations including housing teams during the planning of services.

From a housing and housing support perspective, this means involvement in local population needs assessments at the earliest opportunity so that the appropriate accommodation types can be developed and people are able to receive high quality care throughout the community.

It will also be worth considering the role of digital and technology in how we may develop service provision in the future.

7. Evidence what works through stories and numbers

As noted above, we would suggest that the text from Principle 2 is added to this principle:

'Decisions should be evidence informed and leaders should seek to continuously improve and develop digital, technological and human learning systems required to collect, share and understand evidence including impact and any unintended consequences (positive, negative and neutral), including data; with the aim of minimising data duplication (collect once, use many times)'



Standards

We are broadly supportive of the standards set out in the National Framework.

Standard 1: We welcome the inclusion of a standard which references the values and principles of the Social Services & Well-being (Wales) Act 2014 and the Wellbeing of Future Generations (Wales) Act 2016.

Standard 3: We welcome the standard on data but question whether it could more explicitly reference long term data to support the principle of planning for future generations.

Standard 5: We are very supportive of the interpretation of 'value' being much more than cost, particularly in relation to additional social value. We are also supportive of the reference to environmental impact, but believe there needs to be greater clarification of what this means, particularly for the people being supported. We know that many people are being affected by the current cost-of-living crisis and that energy bills have played a large part in this. Our members do a great deal to help people manage these financial challenges, and housing associations are engaging in significant work to decarbonise their stock. However, this does require capital investment - from both housing and health or social care - to align with the ambitions to improve energy efficiency and environmental impact.

Standard 9: Our members have told us that this is extremely important and would like the commissioning process to be flexible enough to enable longer term commissioning. This would allow commissioners and service providers to maximise better opportunities for service and workforce planning, as well as enabling better, more strategic planning to generate capital investment that will be required to support the rebalancing care agenda.

Standard 10: We fully support this standard, and our members who deliver Learning Disability Supported Living services have pointed to the important role that smaller scale schemes play in promoting people's independence and human rights - and preventing people from needing more restrictive care. Public funding is particularly challenging at the moment, and we believe that it is critical that commissioners consider how decisions about the type of service they commission can impact on people's independence, liberty and human rights.

Question 1.3: Do you think the requirements in relation to Welsh Language will help to offer consistency around the provision of Welsh language service and the active offer?

We agree with the continued use of existing strategies, including 'More Than Just Words', to deliver requirements on Welsh language medium services. However, careful consideration must be given around provisions for short and long term planning of language policy in health and social care.

There is a need to ensure that the social care sector is adaptable to demand for Welsh medium services, including continuing to strengthen data collection on Welsh language use across different areas of Wales and matching this to provision available to service users.



Commissioners being able to deliver Welsh medium services in the long term also requires careful planning within other policy areas such as education to ensure the next generation of Welsh language speakers within the social care sector.

If commissioners are to encourage existing health and social care staff to utilise Welsh language where possible whatever their level, then workers must be supported to communicate in a way that is confident and reassuring to people in their care (e.g. CPD qualifications, Welsh for Social Care).

We must also consider the wider language needs of people in some areas of Wales and ensure they are appropriately supported to access care and support services.

Question 1.4: Do you think the requirements in relation to Equalities will help to promote and improve the rights of individuals receiving care and support and carers?

Our members are committed to delivering high quality services that are accessible to people from a range of different backgrounds.

We suggest the addition of section D: 'Healthcare, social care, and welfare' in the Welsh Government's LGBTQ Action Plan to the list of documents listed under paragraph 1.70.

Additionally, we would welcome a mechanism that enables local authorities and health boards to monitor and ensure that people with protected characteristics do not have less favourable experiences and outcomes of social care services than the general population.

Question 1.7: Do you think the statutory requirements and guidance in the Code will help to refocus the fundamentals of the care market away from price towards a value measure based upon service quality and overall cost?

Overall, we are supportive of these policy aspirations. However, they must be accompanied by sufficient and consistent revenue funding to deliver upon these goals. Prevention always provides better value for money than a crisis response.

Community Housing Cymru's [health and social care toolkit](#) evidences the positive outcomes that can be achieved when housing associations are recognised as a valuable partner in the delivery of health and social care services, as well as the financial benefits of partnership and preventive working to the Welsh economy.

The sector is facing unprecedented challenges following a number of successive crises. We must make sure these policies can translate into implementable action and work quickly to remedy some of the impacts of these challenges.

Social Care Fair Work Forum Pay and Progression Framework

Question 2.1 The principle of the pay and progression framework is to offer a national framework that can support the principles of fair work. Do you believe it can support that ambition and the benefits outlined above?



As highlighted throughout this consultation response, a strong workforce is a prerequisite of high quality care and support services. Housing associations and support providers view pay as a critical factor in the experience of those working within the sector. They recognise that many of their staff are experiencing burn out due to working additional hours or more than one job in order to cover the rising cost of living. Overall we are supportive of outlining a structure that enables workers to be paid fairly for the work that they do, have a clear path for career progression and be appropriately recognised and rewarded for their contribution.

We believe a comprehensive, fully costed framework that is universally implemented across Wales would significantly improve the way social care work is viewed within and outside of the sector, as well as making it a more sustainable career prospect. We consider that a banded approach will help to support the professionalism of the social care and support workforce as well as aligning practice with other public sectors such as education or health.

However, we are clear that any Pay and Progression Framework needs to be fully funded in order for it to be realised. The next stage of this work, as indicated on page 5 of the document, will be critical in advising the Welsh government about the appropriate levels of pay required to fully recognise the valuable work of the social care and support workforce.

The appropriate application of the framework will also be vital, and it will require national leadership to ensure that services are commissioned and funded in a way that recognises the level of skill and expertise required. Some of the services that our members provide will require a greater proportion of staff towards the upper end of this framework, due to the complexity of people's care and support needs. There are already some implemented differentials within the sector, including senior care workers, team leader, lead support workers and complex project workers. When funding is scarce and budgets are under pressure it is important that commissioning processes, funding and specifications enable care and support providers to recruit and retain staff at an appropriate level.

Some of our members feel that the voluntary nature of the framework risks undermining its ambitions and it is difficult to see what the framework would achieve without being mandatory. The framework being voluntary may present an unintended consequence of collapsing smaller providers if they cannot afford to implement the framework, as their ability to recruit and retain staff would be affected.

The voluntary nature of the framework could pose particular challenges to care and support providers that work across multiple local authorities. There could be a situation where some commissioners adopt the framework and provide the appropriate resource to implement it, but others do not. This could prevent care and support providers from being unable to commit to the framework across their services. Some have expressed concerns that this would put them at risk of breaching employment law if different colleagues have different terms and conditions for the same role, depending on their funding authority. If they do commit to the framework and pay all staff at the agreed level, they risk funding shortfalls if some commissioners do not provide the appropriate resource.



We would urge careful thought and consideration to understand how or if this framework can be implemented without causing the unintended consequences noted above.

Question 2.2: Do you have any suggestions about how the framework might be improved to help meet its ambitions?

We have received some comments from member organisations in relation to Band A and Band B. The role descriptions for Band A and Band B are almost identical, and one of our members has expressed concern that this may make it difficult to implement distinct job descriptions and could cause tension between colleagues on different pay for very similar jobs. Another has told us that they do not differentiate between new staff and experienced staff who are operating at care worker level and would therefore see crossover between Band A and Band B. We suggest that the Fair Work Forums considers whether there needs to be more explicit differences between the two role descriptions.

Another consideration is whether there needs to be any distinction between care and support workers in less complex services, versus those who are working in services where the care and support needs are much more complex and therefore the required expertise, knowledge and training is far greater. One suggestion we have received is that Band B should be split into B1 and B2 to reflect the less complex and more complex roles.

It has also been suggested that the draft framework could be strengthened to be more aspirational. For example, the language used to reference 'basic care' in Job Band A and B could be amended to 'strengths based person-centred care' to reflect best practice in the role. In addition, 'supporting people to achieve desired outcomes' could be included in Bands A-C, as well as working in an honest and open way in line with the duty of candour across all bands, but with particular importance in Bands C-E.

One member organisation also raised that the framework could focus more on transferable skills and ensuring that people who have specialised jobs within care can move to roles within local authorities if they wish. This would encourage the professionalism of the sector and allow more people to move in and out of careers within different parts of the sector, which would create more opportunities for progression.

Critical to the success of implementing the framework is outlining costing and funding plans. Our members would prefer that pay increases between bands are described as differentials (%), from a starting point in Band A which has been benchmarked to at least the Real Living Wage, as this would ensure incentives for progression are maintained.

The framework could be improved by stronger requirements to measure centrally determined outcomes. We feel consideration must be given to what data can be collected to evidence the success or failure of the framework. Additionally, it would be beneficial to hold more data on our



existing care and support workforce to understand the skills base available to deliver the framework and uncover any areas where the workforce needs to be developed.

National Office for Care and Support

Question 3.1: Do you agree with the design for the National Office? If not, what design would you suggest?

We have no fundamental issue with the vision for a National Office and the wider goal of a National Care Service and are supportive of efforts to stabilise the sector. Housing associations and third sector providers will be key delivery partners of a National Care Services, and are ready and willing to contribute to its development from inception.

However, we have reservations about the governance of the office and how far it will be independent and able to openly challenge the Welsh government. One of the core functions of the National Office, on page 8, is to '*Act as a strong voice for everyone in the social care sector*'. We would question how effective this can be if the office is part of the Welsh Government and therefore potentially unable to fully and openly hold Ministers to account on behalf of the sector.

Our respective members have raised concerns about whether this will create additional administrative burden within a sector that is already heavily regulated and operating with extremely stretched resources. It is therefore important that the vision for the National Office for Care and Support is developed with a clear strategic understanding of how it will complement existing organisations such as the Welsh government Housing Regulation Team, Care Inspectorate Wales, Social Care Wales, Local Authorities and Health Board contract monitoring teams.

A pragmatic approach should be taken to divide the responsibilities between these organisations in a way that reduces administrative costs for service providers.

Question 3.3: Do you agree with the proposed functions for the National Office, and the relationship described with key statutory organisations, particularly local authorities, Social Care Wales, and NHS Wales? If not, what functions do you disagree with and why?

We are broadly supportive of the three core functions of the National Office, but as referenced above we have concerns about the ability of a Welsh government body to openly challenge and scrutinise the Welsh government on behalf of the social care sector.

As referenced throughout this consultation response, our members' key concern is one of financial sustainability and being able to recruit and retain their care and support workforce. It is notable that the functions detailed in the consultation do not reference pay or fair work, despite the proposals in [Towards a National Care and Support Service for Wales](#) referencing pay, terms and conditions, training and development and parity for workers across health and social care. We would welcome assurances that the National Office will provide national leadership and advocacy on behalf of workers in the care and support sector.



We also suggest consideration of how the National Office will be monitored in its promotion of the Well-being of Future Generations Act and how the outcome of the National Office will be measured.

As well as having the mechanisms to ensure accountability of the National Office itself, we would welcome clarity as to how the National Office for Care and Support will hold local authorities and local health boards accountable for their role in delivering the standards and principles of support and care put forward in the Code of Practice. Although the expert group acknowledged that the National Office would need to recognise the elected status of local authorities of working towards a National Care and Support Service, therefore not infringing upon them, we would like to understand what formal considerations there would be for a National Office upholding the decisions and actions of local authorities in their delivery of care and support, as well as intervention.

While we see one of the main opportunities of the Office as gathering data and intelligence, we must understand how any work the Office does in this area will complement existing data bodies such as StatsWales, Social Care Wales and CIW.

We note that it is currently slightly unclear how this body will interact with service providers and all partners who are part of the care and support ecosystem, and would welcome clarification on this (to include housing associations and housing support providers).

Question 3.5: In its positioning within the Welsh Government and providing for a 'bird's eye view' of the social care system, what are the main opportunities, working with local authorities, Social Care Wales, and other key partners, to drive service change and improvement?

We see the main opportunities as:

- Gathering data and intelligence to provide a national picture of current and future care and support needs, to inform decisions about policy and service delivery.
- Gathering data on the resources needed to sustain a high quality care and support sector and ensuring this informs Welsh Government budget decisions
- Promote, develop and support the recruitment and retention of a high quality, sustainable care and support workforce.
- Providing strong leadership, support and challenge to ensure that the vision of Rebalancing Care and Support can be achieved.
- Encouraging and ensuring consistent approaches to commissioning across Wales.
- Promoting good practice and holding to account poor practice in commissioning care and support services.
- Identifying and removing any duplication or unnecessary administrative burden across the sector.



Part 2 - Code of Practice (General Functions)

We fully support the decision to split chapter 4 of the code into two parts, one dealing with the promotion of social enterprises, co-operatives, user led services and the third sector, and the other focusing on citizen engagement, voice and co-production. These are two critical elements of social care and support in Wales, and warrant separate chapters.

Promoting Social Enterprises, Co-operatives, User Led Services and the Third Sector

We are extremely supportive of the intention within the Social Services and Well-being (Wales) Act 2014 to promote the organisations detailed under Section 16. As highlighted earlier in this consultation response, these organisations play a vital role in the delivery of care and support services in Wales, and bring a huge amount of added social value to the sector.

However, the appropriate funding of these organisations is critical to achieving this intention. Many of our members are concerned that pressures on care and support funding mean that an increasing number of services are at risk of becoming unviable and therefore could force Section 16 organisations to walk away from existing contracts or decide they cannot participate in the tendering process. Section 16 organisations need to be assured that the revenue funding to cover the full cost of delivering the service will be made available if they are to continue to play such an important role in the care and support sector.

We note the language used in the Code of Practice which specifically refers to Section 16 organisations, rather than the broader term of 'social value', suggesting that not-for-profit organisations such as housing associations and third sector support providers, along with co-operatives, are the intended organisations for activity related to the Section 16 duties. We welcome the focus on the not-for-profit sector and clarity that this does not include the for-profit sector. However, we would highlight that housing associations are excluded from the definition of 'social enterprises' under the SSWBA, so we would like to see the inclusion of this group made explicit in the Code of Practice. A list of organisations which are included in the definitions under these proposals would be helpful to avoid confusion within the sector.

As highlighted elsewhere in this consultation response, the promotion of Section 16 organisations requires a positive, respectful and co-productive approach, where relationships between commissioners and providers are valued and the providers are supported to collaborate with commissioning organisations. We also believe there is a need for commissioners to assess the capacity within Section 16 organisations and to consider how their commissioning decisions and processes could help or hinder the involvement of this part of the social care sector.

Engagement, Voice and Co-production

The code requires local authorities to put in place 'robust arrangements' for encouraging and enabling the involvement of people at all stages of the design and operation of services. We consider that clear and evidence-based guidance will be needed on how these arrangements can maximise the involvement of those with lived experience of using services and their families and



carers, as well as how to adapt these arrangements to the variety of different service users across Wales. Some key questions might include: How will the Welsh government ensure that citizens are at the centre of decision-making? How will consistency be maintained across different local authority areas and ensure that all local authorities are equally co-producing with citizens as per Standard 1?

The paper ['Towards a National Care and Support Service'](#) highlighted that:

Despite this ambition, the Expert Group reviewed a great deal of evidence which demonstrates that although much progress has been made, more work is required to deliver the spirit of the Act with consistency across Wales. (p.15)

It is therefore important that the Welsh government considers how this consistency will be managed, and how each local authority or region will ensure that the opportunities for contribution of the Citizen Voice Body will be maintained even as an independent observer of Regional Partnership Boards.

There must be careful consideration of the mechanisms used to develop a strong citizen voice element that is efficient and productive in ensuring outcomes are met, and that accountability can be upheld by citizens and service users. True co-production with citizens will require commissioners and leaders in the sector to share some of their power, which may be unfamiliar and uncomfortable. However, this should be viewed as an essential part of rebalancing care and support.

Consideration should also be given to how people with lived experience can be involved throughout the whole commissioning process, at all four stages of the commissioning cycle illustrated and described in the National Commissioning Framework.

Another area that we believe merits consideration is how we can encourage more people with lived experience of care and support services to join the sector's workforce, where this is appropriate and of interest to them. Having people with lived experience within a workforce can help organisations to have a better understanding of the issues, as well as engaging in co-production with citizens who use the services.

We urge the Welsh government to carefully consider how these policy aspirations will be realised in practice.

Part 9 - Statutory Guidance (Partnership Agreements)

Question 5.2: Have you any comments on the proposed revisions to the Part 9 Statutory Guidance, including any suggestions about what is missing, what could be omitted or where wording could be improved?

We suggest the term Responsible Individual is changed to avoid any confusion with the use of the term in the context of the RISCA regulations.



Question 5.3: Do you agree that the proposed amendments to the regulations and statutory guidance will help to strengthen regional partnership arrangements and the role of Regional Partnership Boards? Do you have any other suggestions about what could be included?

We welcome proposals within this consultation process that focus on expanding membership of the RPBs and ensuring they are valuable spaces where decisions are made. We hope that expanded membership of the RPB translates into a renewed recognition of the importance of having housing and housing support sector representatives contributing to RPBs.

Housing and housing support must be recognised as a priority across all RPBs and there must be a clear, consistent strategy in place. We know poor housing currently costs the NHS in Wales £95 million a year in treatment costs, and that investment in warm, safe homes reduces this cost to individuals and the public purse substantially. Housing support services also play an important role in preventing homelessness, preventing the need for health and social care services and having a sustained positive impact on people's health and wellbeing. Research conducted by Cardiff Metropolitan University indicates that housing support services in Wales generate £1.40 of net annual cost savings for health, social care and criminal justice services per £1 of funding invested. Therefore, it is paramount that RPBs recognise and act on opportunities to engage with the housing sector.

It is clear from discussion with member organisations that housing and housing support representation, at all levels of the RPB, is critical. Across the RPBs there are several examples of where this is happening successfully, with housing being well represented on the partnership board, in relevant sub-groups and in local integration groups.

Community Housing Cymru has undertaken some mapping work to identify similar priorities across RPBs. From this work, it is clear that while RPBs objectives are on the whole similar, the organisational structures differ vastly. For associations and housing support providers operating across multiple RPB areas, finding access points for meaningful engagement is challenging.

Our members tell us that the experiences of the housing association and third sector representatives is inconsistent and varies across Wales. Some have said that the third sector representation can feel tokenistic. We know that third sector organisations are critical partners in the social care and support sector, and they should feel valued, listened to and respected at RPBs.

We warmly welcome the reference to the Housing Support Regional Collaborative Groups in the Code, and hope that this leads to stronger links between the homelessness and housing support sector and the RPBs. We would welcome further efforts to strengthen the third sector housing support representation on RPBs and for there to be more consistency across local health board areas, whether that is through sharing of good practice where it exists, or supporting third sector representatives in their roles.



We understand that regional Section 16 forums may be developed to support the promotion and involvement of social enterprises, co-operatives, user-led services and the third sector. There may be an opportunity for third sector representatives from the RPBs to attend these forums, as this would provide a direct link between the discussions at the forums and the feedback from third sector representatives at RPB meetings. If the forums are arranged to take place in advance of the RPB meetings, a broader range of Section 16 organisations operating in the region would be able to share their views with the third sector representatives, who in turn will be able to speak more authoritatively on behalf of the third sector.

Question 6.2: What support/training is required in implementing the new guidance?

This consultation proposes some large but necessary changes to the care and support sector in Wales. It is critical that due to the scale of these changes they are appropriately complemented by a robust training programme and accessible information and guidance. We would suggest a similar approach to the training provided during the implementation of the RISCA consultation, with a wide range of opportunities to participate in face-to-face and hybrid workshops and explore what the implementation means for commissioners and providers alike.

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