

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

---

A detailed response to each of the recommendations is listed below.

## **Recommendation 1**

*The Committee recommends that*

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

### **Response: Accept**

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

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

**Financial Implications** – Any cost implications will be considered as part of the development of the successor Mental Health Strategy.

## **Recommendation 2**

*The Committee recommends that*

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

*Government's disposal are used to best effect to improve mental health and wellbeing in Wales.*

**Response: Accept in principle**

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

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

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

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

Wales Centre for Public Policy (WCPP) report 'Poverty and Social Exclusion a Way Forward'<sup>1</sup>, published in September 2022, sets out the conclusions of a Welsh Government commissioned review. This includes Mental Load and Mental Health – Addressing the emotional and psychological burden carried by people living in poverty and social exclusion through tackling stigma, (re)humanising 'the system' and treating people with the respect and dignity they deserve. These findings will be taken into consideration as we take forward our commitment to a whole government approach to tackling poverty and inequality and the delivery of Programme for Government commitments through a poverty lens, to meet current need and achieve longer term change.

During 2023, we are involving a wide range of stakeholders, including children and young people, families and communities and the organisations that work with them in

---

<sup>1</sup> [Poverty and social exclusion: A Way Forward by Dan Bristow, Anna Skeels, Manon Roberts & Isabelle Carter Published September 2022](#)

a two-phased approach to the development of a co-constructed revised Child Poverty Strategy for Wales. Importantly, this work includes targeted engagement with those with protected characteristics and the organisations that work with them

**Financial Implications** – Any cost implications will be considered as part of the development of the successor Mental Health Strategy.

### **Recommendation 3**

*The Committee recommends that*

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

### **Response: Accept in Principle**

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

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

**Financial Implications** – Not known

### **Recommendation 4**

*The Committee recommends that*

*The Welsh Government should set out how the new mental health strategy will ensure that people with severe and enduring mental illness will have routine access to physical health checks, and what actions will be taken to minimise the impact of*

*factors such as poverty, disadvantage and diagnostic overshadowing on this group.*

**Response: Accept**

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

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

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

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

We will also be working with the NHS and wider partners to strengthen the existing approach to Care and Treatment Planning which already includes consideration of outcomes across key life areas including finance, housing, work and family.

One of the aims of the successor strategy to Together for MH is to improve the diagnosis and effects of physical ill health and prevention of diagnostic overshadowing will be included as part of this work.

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

**Financial Implications** – Any cost implications will be considered as part of the development of the successor Mental Health Strategy.

**Recommendation 5**

*The Committee recommends that*

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

**Response: Accept**

A demand and capacity review of all neurodevelopmental condition services was completed in March 2022. In response, in a Written Statement of 6 July the Deputy Minister for Social Services announced a neurodivergence improvement programme

backed by £12million of additional funding. The programme has commenced; an initial £1.4 million has been allocated to Regional Partnership Boards to meet urgent need. The programme has three workstreams, the first, considering early help and support, the second, developing sustainable neurodevelopmental services and the third to ensure cross cutting priorities including data and workforce are progressed. Support for neurodivergent people with co-existing conditions including meeting mental health needs will be developed as a priority area within the programme. The programme will align with the NEST/NYTH framework for children and young people's well-being and will take a whole system approach to developing services. To oversee this work, we have established a Ministerial Neurodivergence Advisory Group, which is co-chaired by individuals who have lived experience of neurodivergence. In November we undertook a series of public engagement events across Wales to discuss the programme's priorities and seek stakeholder views. The feedback received was positive and was summed up in a bilingual summary report<sup>2</sup>.

**Financial Implications** – An additional £12million has been provided up to March 2025 to secure improvements in neurodevelopmental condition services.

### **Recommendation 6**

*The Committee recommends that*

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

### **Response: Accept**

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

**Financial Implications** – As above

---

<sup>2</sup> [Neurodivergence improvement programme: engagement events November 2022 | GOV.WALES](#)

### **Recommendation 7**

*The Committee recommends that*

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

#### **Response: Accept**

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

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

**Financial Implications** – Any cost implications will be considered as part of the development of the successor Mental Health Strategy.

### **Recommendation 8**

*The Committee recommends that*

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

#### **Response: Accept**

In our Mental Health Delivery Plan for Wales 2019-2022 we outline our commitment to ensuring support is equitable and accessible, and that services are delivered in

line with the all-Wales standard for communication and information for people with sensory loss.

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

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

The Deaf People in Wales Report will be crucial in informing ongoing work in this area.

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

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

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

**Financial Implications** – No immediate financial implications.

### **Recommendation 9**

*The Committee recommends that*

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

### **Response: Accept in principle**

In February 2021, the British Deaf Association (BDA) undertook an audit of the

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

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

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

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

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

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

The 2018 Guidance for Health Boards on the Health and Wellbeing of Asylum Seekers and Refugees sets out expectations for health boards in terms of support for asylum seekers and refugees. In 2021, Welsh Government officials wrote to the health boards to remind them of their responsibilities in delivering the priorities set out in the 2018 Guidance on the health and wellbeing of asylum seekers and refugees, particularly in relation to providing access to interpreters and ensuring that



language is not a barrier to accessing services.

**Financial Implications** – Any financial implications would be considered when developing the recommendations to support duties under the Equalities Act.

### **Recommendation 10**

*The Committee recommends that*

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

#### **Response: Accept**

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

**Financial Implications** – No immediate implications

### **Recommendation 11**

*The Committee recommends that*

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

#### **Response: Accept in principle**

The new Trauma-informed Practice Framework will be a key component in the Welsh Government's drive to make Wales a trauma-informed nation. The framework

will help inform existing and new policy, including the new mental health strategy and the Adverse Childhood Experiences (ACEs) Plan. It will also contribute towards the broader aims of tackling inequality, improving individuals' life outcomes, and making Wales a more prosperous and equal country.

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

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

**Financial Implications** – The Deputy Minister for Social Services has agreed to provide funding of a minimum of £300k, £350k and £400k for 2022-23, 2023-24 and 2024-25 respectively, to support the implementation of the Trauma-Informed Wales Framework.

The Welsh Government also provides £1.2 million a year to Traumatic Stress Wales, which aims to improve the health and wellbeing of people of all ages living in Wales at risk of developing, or with, post-traumatic stress disorder (PTSD) or complex post-traumatic stress disorder (CPTSD).

## **Recommendation 12**

*The Committee recommends that*

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

## **Response: Accept in principle**

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

infant relationships and interventions.

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

**Financial Implications** – Not yet known

### **Recommendation 13**

*The Committee recommends that*

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

### **Response: Accept in principle**

This information is already available on the 111 website for national support (NHS 111 Wales - Health A-Z: Mental Health and Wellbeing<sup>3</sup>) and via DEWIS for local/community-based support. The CALL helpline handlers have access to a comprehensive directory of local services (by postcode) to signpost people to local support. We also provide more tailored information for specific cohorts, for instance the Youth Mental Health Toolkit which is hosted on HWB. As opposed to developing a new online directory, our aim is to improve the current information available and to ensure people are aware of how to access resources.

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

**Financial Implications** – None.

### **Recommendation 14**

*The Committee recommends that*

*To accompany the publication and ongoing implementation of the social prescribing framework, the Welsh Government should develop and deliver targeted communication campaigns to promote awareness of social prescribing and the new*

---

<sup>3</sup> [Mental Health and Wellbeing \(111.wales.nhs.uk\)](https://111.wales.nhs.uk)

*framework among health professionals, services and community groups and organisations to which people could be prescribed, and the general public.*

**Response: Accept**

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

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

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

**Financial Implications** – Not yet known

**Recommendation 15**

*The Committee recommends that*

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

**Response: Accept in principle**

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

**Financial Implications** – Not yet known

**Recommendation 16**

*The Committee recommends that*

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

**Response: Reject**

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

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

This skills and competency framework will set out the key knowledge and skills needed to successfully perform the social prescribing role and will go some way to developing a more professional structure for the social prescribing workforce.

However, given the complexity of the makeup of the social prescribing workforce, with many based in local authorities and third sector organisations, negotiating specific pay, terms and conditions are outside the remit of the Welsh Government and are the responsibility of the employing organisations. For this reason, we are unable to accept this recommendation.

**Financial Implications – None**

**Recommendation 17**

*The Committee recommends that*

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

**Response: Accept**

Progress on delivery of the actions in the mental health workforce plan and their impact will be monitored through an implementation board established by HEIW and

Social Care Wales, which includes people with lived experience, Royal Colleges, the voluntary sector, the Welsh Government and other key stakeholders. Regular updates will be provided to the Welsh Government's Mental Health Oversight and Delivery Board, National Partnership Board, and to the HEIW and Social Care Wales public boards. An annual, public-facing report will be published detailing progress.

**Financial Implications** – Current financial implications are being picked up through existing budgets.

### **Recommendation 18**

*The Committee recommends that*

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

#### **Response: Accept**

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

**Financial Implications** – Current financial implications are being picked up through existing budgets.

### **Recommendation 19**

*The Committee recommends that*

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

#### **Response: Accept**

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

**Financial Implications** – None

### **Recommendation 20**

*The Committee recommends that*

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

### **Response: Accept**

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

**Financial Implications** – Current financial implications are being picked up through existing budgets.

### **Recommendation 21**

*The Committee recommends that*

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

*people of Wales.*

**Response: Accept in principle**

The Welsh Ministers are subject to the sustainable development and well-being duty in the Well-being of Future Generations (Wales) Act 2015, which requires public bodies to carry out sustainable development, and in doing so contribute to the seven well-being goals. Within those goals ‘A Healthier Wales’ is described as “A society in which people’s physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood”. In implementing the WFG Act, the Welsh Government has embedded the Act in how it develops policy and advice to Ministers. This is part of a more integrated approach to the assessment of policy impact which already includes consideration of health and mental wellbeing through incorporating our established health impact assessment practices.

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

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

**Financial Implications – None**

**Recommendation 22**

*The Committee recommends that*

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



**Response: Accept in principle**

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

**Financial Implications** – None

**Recommendation 23**

*The Committee recommends that*

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

**Response: Accept**

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

**Financial Implications** – Any cost implications will be considered as part of the development of the successor Mental Health Strategy.

**Recommendation 24**

*The Committee recommends that*

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

### **Response: Accept**

A key priority for the Welsh Government and NHS Wales is to ensure that health and mental health data in relation to race, ethnicity and intersectional disadvantage is actively collected, understood and used to drive and inform continued improvements in services and to ensure the underpinning of equitable outcomes in service delivery. We already publish a range of activity data, some of which includes ethnicity information, as part of the NHS Benchmarking Programme. The latest NHS Benchmarking information for Wales can be accessed online ([nhs.wales](https://nhs.uk/wales))<sup>4</sup>.

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

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

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

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

**Financial Implications** – Current financial implications are being picked up through existing budgets.

### **Recommendation 25**

*The Committee recommends that*

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

### **Response: Accept**

---

<sup>4</sup> [Events - National Collaborative Commissioning Unit \(nhs.wales\)](#)

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

The Welsh Government already publishes data on the mean mental wellbeing score for people aged 16 and over in Wales using the Warwick-Edinburgh Mental Well-being Scale (WEMWBS) as part of reporting on Wellbeing of Wales: National Indicators<sup>5</sup>.

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

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

**Financial Implications – None**

### **Recommendation 26**

*The Committee recommends that*

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

### **Response: Accept**

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

We will broker a discussion with Policing in Wales on:

- The training which is currently available on these subjects and how it is used.

---

<sup>5</sup> [Wellbeing of Wales: national indicators \(gov.wales\)](https://gov.wales/wellbeing-of-wales-national-indicators)

- How accessibility and awareness of the existing training can be increased.
- Where there might be opportunities for new links or further work.

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

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

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

**Financial Implications** – No immediate implications

### **Recommendation 27**

*The Committee recommends that*

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

### **Response: Accept**

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

needs of minority ethnic communities and will be a key stakeholder in ongoing discussions and work to implement the reforms of the Mental Health Act planned for Wales, and the development of the supporting Code of Practice for Wales.

Following publication of the White Paper outlining proposed reforms to the Mental Health Act aimed at delivering the recommendations of the Wessely Review, Welsh Government officials undertook a series of discussions with stakeholders and partners in Wales, including the Ethnic Minorities Mental Health Task and Finish Group, to determine which of the proposals would be beneficial to Wales. Following those discussions, the Welsh Government wrote to the UK Government Secretary of State for Health to outline our position about which of the proposals we would like to extend to Wales and include in a draft Mental Health Bill. In line with the Sewel Convention, it is likely that a Legislative Consent Motion will still need to be passed in the Senedd once the Bill is introduced, in accordance with section 107(6) of the Government of Wales Act 2006 and the Senedd's Standing Orders. The Welsh Government's final recommendation to the Senedd about whether to pass such a motion will be subject to our being satisfied with the final provisions in the Bill.

The draft legislation has been subject to pre-legislative scrutiny in the UK Parliament, and the relevant scrutiny committee published its report on 19 January 2023. The recommendations in that report are likely to result in changes to the proposed Bill compared to the first draft. Welsh Government officials will continue to work closely with their UK Government counterparts to consider the extent to which Wales should be included in any new or substantively different provisions that emerge as the Bill is developed in light of the committee report.

**Financial Implications** – No immediate implications

**Lynne Neagle MS**

**Deputy Minister for Mental Health and Wellbeing**