

Written response from the Welsh Government to the report by the Equality and Social Justice Committee entitled *60% - Giving them a voice - Speech, Language and Communication Needs in the Youth Justice System*

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

Recommendation 1

The Committee recommends that

We recommend that the Welsh Government convene a summit of key stakeholders working in the sector with the aim of formulating a new workstream looking specifically at the impact of SLCN on children and young people and the link to the involvement of most young people involved with the youth justice system. The summit and concomitant workstream should be finalised before the end of 2023 and include realistic actions, measurable targets, and a timeline for their completion within the All-Wales Justice Board forward work programme.

Response: Accept

Work is ongoing under the Youth Justice Blueprint on a Prevention Framework for youth justice services. This will consider the preventative work delivered by youth offending services teams across Wales, ensuring there is a framework in place for sharing knowledge and promoting consistency of delivery. This framework will include how youth offending services teams work in partnership with devolved policy areas and will structure conversations about possible opportunities for improving the strength and consistency of provision for these services across Wales.

Financial Implications – Not yet known

Recommendation 2

The Committee recommends that

The Welsh Government should set out in its response to this report how it intends to work with local education authorities, school leaders and governors and, where appropriate, local health boards, to ensure better understanding and awareness of SLCN in children and young people as they progress from primary to secondary school.

Response: Accept

The Curriculum for Wales which has been introduced into schools from September 2022 places emphasis on speaking skills. Oracy is a key part of the literacy cross curriculum skill which for the first time is a mandatory part of the curriculum and will be taught across all subject areas.

The 'Our National Mission: High Standards and Aspirations for All' document sets out that all learners will receive targeted support to improve cross- curriculum skills as we deliver on our Oracy and Reading Toolkit.

Current preventative activities include Welsh Government's 'Talk with Me' (TWM) delivery plan, which prioritises evidence based support for SLC at universal, population and targeted levels. By getting early identification and support right, we can reduce the demand for specialist services and free up capacity to support learners with more specialist needs, including ALN.

Objective 4 of the TWM plan is to 'upskill the childcare, health and social care workforce to address SLC needs'. The All Wales SLC 0-5s training pathway tool has been rolled out in order to address this commitment. Settings across Wales can access a range of SLC training options. We also have a dedicated Talk with Me practitioner page which provides a wide range of resources to support practitioners in giving evidence-based support.

Financial Implications – None

Recommendation 3

The Committee recommends that

The Welsh Government should work with Police and Crime Commissioners through the Youth Justice Blueprint Programme Board to assess the feasibility of having dedicated NHS speech and language therapists working in custody suites at police stations with a view to embedding them across Wales in the medium term. The initial feasibility work should be concluded within three months and the Welsh Government should report back to this Committee with its findings.

Response: Reject

The benefits arising from this recommendation for young people in custody suites are recognised. However, there are only around 800 registered speech and language therapists (SLTs) in Wales. There are currently insufficient NHS employed SLTs to meet this additional workload. A feasibility study will identify that workforce pressure. This would require additional training places and the creation of workforce establishment (posts). There could be potential for private SLTs to be used but given the current challenging financial situation, there would be significant challenge in funding both the education of additional SLTs to meet this demand in the long term

and a challenge in funding the employment of these workers, either by Health or the Justice system.

One of the actions in the National Workforce Implementation Plan is for HEIW to review the allied health professions, including SLTs, to understand the current position and future needs to deliver services. This should provide some of the data and analysis to understand the workforce requirements.

Financial Implications – Not yet known, however there could be significant workforce implications given current waiting times. Potential financial implications could arise as NHS SLTs are not employed to do this currently. Waiting times data (Feb 2023) shows 3,805 people currently waiting for an SLT assessment and treatment.

Recommendation 4

The Committee recommends that

The Welsh Government should work with its partners in the youth justice system to extend the current ‘active offer’ entitlement of independent advocacy to children and young people with speech, language and communication needs in the criminal justice system and report back on progress within 6 months.

Response: Accept in principle

We will use the evidence provided to the Committee to ensure that children’s views, wishes and feelings continue to be at the centre of decisions that affect them. This will engage all relevant partners to secure a consistent and coherent offer for independent advocacy across the youth justice system that empowers, listens and responds to children’s voices.

The work on the Prevention Framework for youth justice services being delivered under the Youth Justice Blueprint will ensure this offer is embedded and used effectively across the youth justice system.

Financial Implications – No immediate implications

Recommendation 5

The Committee recommends that

The Welsh Government should update the Committee on progress by HMPPS in implementing the recommendations of the Joint Inspection Report on Neurodiversity in the Criminal Justice System.

Response: Accept in principle

As the CJS is non-devolved Welsh Government cannot comment on progress. However, in order to improve outcomes for neurodivergent people within the CJS in line with recommendation 1 of the Joint Inspection on Neurodiversity in the Criminal Justice System, we continue to work closely with our colleagues in the Ministry of Justice to advise on devolved areas and where appropriate advise on the development of appropriate strategies. We are working with the newly appointed ND co-ordinators in prisons within Wales and are helping facilitate better connections between the MoJ and ND services in Wales.

Financial Implications – No immediate implications

Recommendation 6

The Committee recommends that

The Welsh Government should work with local authorities to develop plans for embedding speech and language therapists within every Youth Offending Team in Wales. This work should be completed by December 2023.

Response: Reject

The work on a Prevention Framework for youth offending in Wales, being taken forward under the Youth Justice Blueprint and referred to in our response to Recommendation 1, will also be relevant for this recommendation.

The benefits for young people arising from this recommendation are recognised. However, there are only around 800 registered speech and language therapists in Wales. There are insufficient NHS employed SLTs to meet this additional workload to NHS services. This would require additional training places and workforce supply. A feasibility study will identify that workforce pressure. There could be potential for private SLTs to be used, but given the current challenging financial situation there would be significant challenge in funding both the education of additional SLTs to meet this demand in the long term and a challenge in funding the employment of these workers, either by Health or the Justice system.

One of the actions in the National Workforce Implementation Plan is for HEIW to review the allied health professions, including SLTs, to understand the current position and future needs to deliver services. This should provide some of the data and analysis to understand the workforce requirements.

Financial Implications – There could be significant workforce implications here given current waiting times. Potential for significant financial implications as NHS SLTs are not employed to do this currently.

Recommendation 7

The Committee recommends that

The Welsh Government should work with Health Education Improvement Wales (HEIW) to address any shortages being faced in the speech and language therapy profession, mapping the current roles and competencies of the SLCN workforce and ensuring adequate future workforce planning. The initial mapping work should be completed by December 2023.

Response: Accept

The Minister for Health and Social Service published the National Workforce Implementation Plan in January 2023. In the plan two specific actions have been assigned to HEIW regarding all Allied Health Professions:

- HEIW will review allied health professions to understand the current position and future needs to deliver our services, resulting in an AHP retention plan. This action is due for completion by 31 July.
- HEIW will use the AHP workforce guidance to organise how AHPs work in integrated services, maximising their impact, wellbeing and professional governance and skill mix. This action is due for completion by 30 September.

It is intended these actions will assist in addressing workforce planning across all AHPs, including the speech and language therapy profession.

Welsh Government have established a Strategic Workforce Implementation Board, who are directly responsible to the Minister for Health and Social Services, that will ensure progress against the actions in the Plan. I understand Caroline Walters of the Royal College of Speech and Language Therapists is a member of this board.

HEIW is responsible for the annual education and training commissioning process in Wales, to address workforce requirements on behalf of the NHS Wales.

There are currently 49 speech and language therapist training places available across Wales, split across the two training programmes operating in Wrexham and Cardiff. The number of student places was increased in 2020 by 10%, from 44 places to 49. The number remains at 49 for 2023/24, to match service demand.

HEIW will continue to engage with NHS health boards, trusts and wider stakeholder groups including Social Care Wales to create and inform the education and training plan for 2024/25. Ultimately it is HEIW's responsibility to produce a plan that is deliverable and meets long term service needs within the context of the education and training capacity available.

Financial Implications – None. Any additional costs will be drawn from HEIW's existing programme budgets.