

## Consultation Response Form

### Consultation response form

Your name: Dai Davies Policy Officer

Organisation (if applicable): Royal College of  
Occupational Therapists

Royal College of Occupational Therapists /Coleg  
Brenhinol y Therapyddion Galwedigaethol  
106-114 Borough High Street, London SE1 1LB  
T: 01685 386445 07585606385  
Email: david.davies@rcot.co.uk

Responses should be returned by **05 August 2019** to:

Well-Being & Improvement Branch  
Social Services & Integration Directorate  
Cathays Park  
Cardiff  
CF10 3NQ

or completed electronically and sent to: [SocialServicesImprovement@gov.wales](mailto:SocialServicesImprovement@gov.wales)

Q1. To what extent do you agree that the Code of Practice (set out in Annex A) will support local authorities to measure performance and inform improvement in relation to the social services functions placed upon them under the Act?

Strongly Agree	Agree	Disagree	Strongly Disagree

Comments:

RCOT welcomes that the Code of Practice is seeking to achieve a real change in how social services in Wales are measured and reported on and how the information gathered is used to inform the future of social services in Wales. RCOT data indicates that despite making up just 4% of the regulated workforce, occupational therapists address 35 – 45% of local authority referrals and therefore occupational therapists will have major contribution to efficient, effective and high quality social service functions in Wales

RCOT agree with the principles performance framework and the quality standards are a reasonable frame for setting ambition and articulating progress against the act. Our members are completing “what matters conversations” with citizens daily and are keen that the quality of those interactions and then the outcomes that follow are measured and are highlighted effectively

An increasing number of our occupational therapists are working in multi disciplinary and multi agency teams and with the future transformational elements of the Healthier Wales policy in moving health care into the community. We feel it is importance this is highlighted as more and more social services functions will be provided by integrated services that include Health Boards.

Q2. To what extent do you agree that the **Quality Standards** (as set out in the Code of Practice) enable local authorities to measure performance and inform improvement in relation to the social services functions placed upon them under the Act?

Strongly Agree	Agree	Disagree	Strongly Disagree

Comments

RCOT supports quality standards which are also central to supporting the Welsh government vision for a health and social care system in a Healthier Wales.

Quality standards are a reasonable frame for setting ambition and articulating progress against the act. RCOT recommends that the quality standards are designed in a way that will challenge local authorities, to learn, improve and develop care and support and deploy new innovative approaches to measurement to evidence their impact in relation to the Act.

RCOT welcomes the personalisation aspect of the quality standards. There is no doubt that people themselves are experts in what is important to them and that Care and support planning that embeds a shared approach to decision making recognises

that people bring different, and equally important, knowledge and expertise to the process.

Q3. To what extent do you agree that the **Performance and Improvement Framework** (as set out in the Code of Practice) enables local authorities to measure performance and inform improvement in relation to the social services functions placed upon them under the Act?

Strongly Agree	Agree	Disagree	Strongly Disagree

Comments:

RCOT suggests that services need to find new structures and ways of working that fully utilise professional skills, whilst supporting people to take greater responsibility and roles in meeting their own health and social care needs. RCOT agree with the principles in the performance framework and the quality standards are a reasonable frame for setting ambition and articulating progress against the act

Occupational therapists are leading a number of innovative and effective service developments in Wales, and we feel that the performance and improvement framework must support new ways of working and services should have space to experiment with new ideas. New effective models should then be allowed to be shared throughout wales. We need the whole health and care system to work together even more seamlessly and the performance and improvement framework should support this

Q4. To what extent do you agree that the metrics within the **Technical Guidance** demonstrate the full range of activities that local authorities are required to deliver in relation to the social services functions placed upon them under the Act?

Strongly Agree	Agree	Disagree	Strongly Disagree

Comments:

ROCT have concerns around the measurement of Occupational Therapy within the technical guidance, the metrics focus on process and not on the quality of each interaction and how that could have a positive or negative effect on the citizen. The proposed framework has a focus on process and compliance rather than on what matters to people and the positive impact on their daily lives.

Social Care & Health is a complex system with many factors and associated interactions at play, it is too simplistic to attribute "cause and effect" to a single organisation, service, project . We are interested to see how this would be addressed in this work

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Q5. Considering the metrics that are set out in the **Technical Guidance**, do you have any specific comments in relation to the metrics that are being proposed? Please include the metric reference in your response.

Strongly Agree	Agree	Disagree	Strongly Disagree

Comments:

Our members feel the technical guidance is extremely long and that the metrics tell them little other than volume, which will vary due to the nature of different local authorities and depending on the practices within. They don't believe the approach of measuring such a significant volume of metrics will allow them to measure the true expectations and impact of the Act within their areas.

Q6. The qualitative component of the Performance and Improvement Framework is still under development. Thinking specifically about **Qualitative Data**, what, in your view, should be included in this component so that we are able to understand and improve people's experiences of care and support and carer's experiences of support?

Strongly Agree	Agree	Disagree	Strongly Disagree

Comments:

RCOT welcomes measures to demonstrate both effectiveness and satisfaction with services and this requires a robust collection of information. Measurement needs to focus on outcomes that matter to people, their families, and carers. This should focus on people's strengths, balancing choice and risk, maintaining people's occupations (daily activities) and connecting people to their community, family, carers and friends

Q7. The Research and Evidence component of the Performance and Improvement Framework is still under development. Thinking specifically about **Research and Evidence**, what, in your view, should be included in this component so that we are able to understand and improve people's experiences of care and support and carer's experiences of support?

Comments:

Research and evidencing practice is an important element of an occupational therapist's practice. Our members are leading a number of innovative and effective service developments in Wales, the performance and improvement framework must support new ways of working and services should have space to experiment with new ideas and areas of research.

A new approach which moving away from traditional approaches is required at all levels and across all agencies. This new approach must facilitate scrutiny and accountability, and evidence the positive and negative impact of all models

Q8. To what extent do agree that the Children Receiving Care and Support Census, the Looked After Children Census, the Adults Safeguarding return and the Staff of local authority departments return are fit for purpose and should be included as they are into the new Performance and Improvement Framework?

Strongly Agree	Agree	Disagree	Strongly Disagree
Comments:			

Q9. To what extent do you agree that Welsh Government should develop an annual census for Adults Receiving Care and Support?

Strongly Agree	Agree	Disagree	Strongly Disagree
Comments:			
<p>Our members would be keen to see a clear purpose and intended use for this. They feel unclear about the value this would bring in proportion to the effort in collection and collation of the data required.</p>			

Q10. What, if any, additional support does Welsh Government need to put in place to support local authorities to implement the new Code of Practice and the Performance and Improvement Framework?

Comments:			
<p>Our members have concerns that the implementation timescales aren't achievable and realistic. They have stated that this would be a significant change not just in systems but in practice and may have an impact on services.</p>			

Q11. What metrics should be developed to measure the impact and effectiveness of integration and ways of integrated working?

Comments:			
<p>Our members do not believe that it is easy to deploy a set of quantitative indicators to measure and compare the impact and effectiveness of the Integrated Service across local authority areas and health boards in Wales, given there is significant variation between people and across all integrated services in Wales. For example, the Delayed Transfer of Care (DTC) from hospital into the community is one measure of the average end to end time in days, and whether people are</p>			

independent at home following a period of reablement is another measure.

Our members have stated that it is important for all practitioners to work with the local health boards on a continuous process of learning and improvement, using a range of methodologies to evaluate impact and effectiveness

Q12a. Do you think that the proposals in this consultation will have any positive impacts on groups with protected characteristics? If so, which and why/why not?

Please explain:

Q12b. Do you think that the proposals in this consultation will have any negative impacts on groups with protected characteristics? If so, which and why/why not?

Please explain:

Q13a. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Please explain:

Q13b. Please also explain how you believe the proposed policy could be formulated or changed so as to have:

Please explain:

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: