

	The Welsh NHS Confederation response to the Public Accounts Committee's inquiry into barriers to implementing the Well-being of Future Generations (Wales) Act 2015.
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Introduction

1. The Welsh NHS Confederation welcomes the opportunity to respond to the Public Accounts Committee's inquiry into barriers to implementing the Well-being of Future Generations (Wales) Act 2015.
2. The Welsh NHS Confederation represents all the organisations that make up the NHS in Wales: the seven Local Health Boards, three NHS Trusts and Health Education and Improvement Wales (HEIW). We support our members to improve health and wellbeing by working with them to deliver high standards of care for patients and best value for taxpayers' money. We act as a driving force for positive change through strong representation and our policy, influencing and engagement work. We also host [NHS Wales Employers](#).
3. Earlier this year, the Welsh NHS Confederation published a briefing, [The journey towards delivering the Well-being of Future Generations Act \(2015\) across NHS Wales](#) and a [podcast](#) with the Commissioner. The publication and podcast provide an overview of some of the projects and initiatives currently being delivered by NHS organisations as part of the journey to implementing the Well-being of Future Generations (Wales) Act 2015, starting with adopting small changes and moving on to deliver greater changes. We have also recently held a successful [webinar](#) with the Commissioner, attended by our members, stakeholders and colleagues across the UK, to discuss the impact of COVID-19 and what public sector bodies, including the NHS, could be doing to support the health and wellbeing of the population now and in the future.
4. In September 2020, the Welsh NHS Confederation published its Senedd election briefing, [Valuing, Engaging and Delivering: A health and care system for future generations](#), which sets out a number of key calls for the next Welsh Government. The briefing was developed following extensive engagement with our members and called for the next Welsh Government to introduce performance measures that focus on quality-based outcomes, prevention, community services and whole-system collaboration. The call was made due to the fact that the current NHS performance targets focus too specifically on acute and secondary care and do not always support the system to grow and redesign, such as moving services into primary and community care and preventative services. While targets have a role to play, we must also look at the bigger picture, instigating a whole system change in the way treatment is delivered, how services are provided, and population health measured. A key driver within this is the Well-being of Future Generations (Wales) Act 2015. To improve population health and wellbeing further, it is vital that meaningful person-centred performance measures and frameworks are developed across health and social care which focus on patient experience, clinical outcomes, prevention, whole-system collaboration and applying value

based healthcare (which is delivering outcomes that matter most to patients for the same or lower cost).

Awareness of the Act and its implications

5. Overall, awareness of the Well-being of Future Generations (Wales) Act 2015 among NHS Wales Board members (that is, Chairs, Chief Executives and Executive Directors) is high. The Future Generations Commissioner's office meets annually with the NHS Chairs Peer Group. The Commissioner has also engaged with individual Health Boards and Trusts, particularly in relation to sharing resources and other materials to support organisations' efforts to implement the Act. The Wales Audit Office paper, '[Reflecting on Year One: How Have Public Bodies Responded to the Well-being of Future Generations \(Wales\) Act 2015?](#)', published in May 2018, has also supported NHS Wales leaders' awareness of the Act and its implications for their individual organisation.
6. Outside of NHS Wales organisations' Board members, awareness of the Act and its implications is mixed. In some areas, NHS staff have an excellent understanding of the legislation and its significance within their role and department. This is particularly true for NHS staff working in early years services, environmental services and mental health services for example, with clear plans in place around how the vision outlined in the Act is to be implemented. There is also a good general understanding of the Act and its implications among planning and strategy teams, capital planning teams, and public health teams. However, for more acute secondary care services, specifically for clinical frontline staff, understanding of the Act and what it means for the specific role is based more on an individual's knowledge rather than departmental awareness.
7. Moreover, the Act is multi-faceted and complex, and while NHS Wales organisations welcome the high-level, simplified resources available via the Future Generations Commissioner's website that clarify what the legislation is in simple terms, NHS Wales organisations feel that challenges remain around conveying a single, clear message around what the legislation means for individuals, communities, organisations and their staff.
8. Finally, further steps are needed to achieve greater awareness of the Act and what it means for members of the public and for Welsh communities. Our members recognise that the NHS, as the largest employer in Wales and an institution that plays such a key role in contributing to the wellbeing of local populations, has a key role to play in supporting the Commissioner to increase awareness and understanding of the Act and the principles within it.

Resources available to public bodies to implement the Act and how effectively they have been deployed

9. Across Wales, small amounts of funding have been made available to Local Authorities in recent years to support the work of Public Service Boards (PSBs) in implementing the Act. However, this funding was not allocated this year (2020 – 21) due to the COVID-19 pandemic and it is unclear whether the funding will be made available in the Welsh Government's budget for 2021-22, or in future years..

10. While Health Boards make small financial contributions to PSBs from their own individual budgets, Health Boards do not receive financial support or resources from the Welsh Government to support the implementation of the Act. The expectation is that implementing the Act falls within a Health Board/Trust's core business responsibilities and so it is therefore absorbed by a number of individuals' budgets within each organisation who lead on implementing the Act. In recent years, many of these roles have had to be broadened to encompass the significant reporting responsibilities that compliance with the Act entails.
11. NHS Wales organisations recognise that implementing the Act should be a key part of core business, both on an organisational level and an individual level. However, developing the level of knowledge and robust partnerships with key partners, particularly PSBs and Regional Partnership Boards (RPBs), takes time and workforce capacity, particularly when, as mentioned, there is no specific financial resource available to support this process. In addition, some Health Boards are members of numerous PSBs that sit within the Health Board footprint. The strategic priorities of each PSB are not necessarily identical, which can lead competing priorities for the Health Board to take forward in this space. While RPBs sit on a Health Board footprint, PSBs sit on a Local Authority footprint, and as highlighted in our Senedd election briefing, there are challenges with the governance arrangements around RPBs and PSBs. Further clarity is required around the relationship between RPBs and PSBs so that they work in an interconnected and joined-up way.
12. Finally, implementing the Act is particularly challenging for NHS Wales organisations currently in targeted intervention/enhanced monitoring. The main reason for this is because the Act sets out the requirement for public bodies to adopt a long-term vision that embodies the well-being goals and ways of working, but this is challenging when a NHS organisation is required to submit a number of annual plans to the Welsh Government within a strategic context as opposed to an Integrated Medium-Term Plan (IMTP), which clearly would allow for a greater emphasis on planning for the longer-term. Those NHS organisations that have recently seen their level of escalation reduce (e.g. from 'targeted intervention' to 'enhanced monitoring') recognise that this is an opportunity to reconsider how the organisation implements the Act more comprehensively despite pressures across the system brought about by the COVID-19 pandemic.

Supported provided to public bodies by the Future Generations Commissioner

13. There have been two main ways in which NHS Wales organisations have interacted with the Future Generations Commissioner, particularly since the beginning of the COVID-19 pandemic. Firstly, NHS Wales organisations have responded to a number of requests from the Commissioner's office to provide information e.g. measuring progress against the '80 simple changes', completing self-assessment forms and responding to a specific procurement review; and secondly, through attending webinars and virtual workshop events convened by the Commissioner's office. NHS Wales organisations recognise that the Commissioner's team produces a significant amount of material, including raising awareness of ways of working that could be adopted on a Health Board level.

14. However, while the volume of material produced by the Commissioner's office is comprehensive, the extent to which the role of the Commissioner's office is to adopt a 'hands on' approach to supporting NHS Wales organisations in implementing the Act is not always clear. NHS Wales organisations would welcome more practical support opportunities from the Commissioner's office - aimed at Chairs, Chief Executives, Independent Members and Executive Directors – to support their understanding of how they can apply the duties of the Act within their corporate decision making, scrutiny, assurance roles and wider legislative frameworks that they have to work in.

The leadership role of the Welsh Government

15. NHS Wales organisations note that the Well-being of Future Generations (Wales) Act 2015 is increasingly being referred to in Welsh Government policy documents, guidance and budgets. However, our members feel that greater clarity could be provided in this guidance around how accountability and performance management arrangements on an organisational level reflect the legislation's requirements.

16. One of the key policy drivers for the NHS is the Welsh Government's long-term plan for health and social care, [*A Healthier Wales*](#). The vision and the Quadruple Aim set out within the Plan clearly aligns with the Well-being of Future Generations (Wales) Act 2015 and provides the mechanism for health and social care to contribute to achieving the goals defined in the Act. *A Healthier Wales* is fundamentally about supporting people to live healthy, happy lives and supporting a cross-sector approach to supporting people to stay well at home. NHS organisations welcomed the publication of *A Healthier Wales* in June 2018 and are supportive of the vision for a health and care system that is focused on wellbeing and preventing illness. This means having a health and care system that supports people to stay well - not just treat them when they become ill. Putting people at the heart of everything the NHS does and designing services through co-production, a key part of delivering this vision, is reflected by the ten national Design Principles in *A Healthier Wales*. *A Healthier Wales*, through its emphasis on healthy communities and the 'health in all policies' approach, is a lens through which we can identify and support new models of health and social care so they can be scaled-up across Wales. Since *A Healthier Wales* was published, NHS organisations across Wales have been working to deliver the vision set out in the long-term plan for health and social care.

17. A number of Welsh Government funding streams continue to be time-limited in nature which hinders long-term planning and the shift towards prevention on an organisational level. While IMTP planning guidance does include a section on the Well-being of Future Generations (Wales) Act 2015, this is not referenced as a cross-cutting theme, which could be construed as being at odds with the broad-ranging focus that the Act is designed to adopt. Rather than focusing on delivering the long-term goals set out under the Well-being of Future Generations (Wales) Act 2015, organisations' IMTPs focus predominately on short to medium-term delivery issues e.g. tier 1 targets and waiting times. While thinking about the long-term and prioritising prevention, and embedding the principles of the legislation,

are principles that NHS Wales organisations fully support, the pressures across the health system, with increasing demand for NHS services, the challenges NHS organisations face in responding to COVID-19 and the uncertainty surrounding the Welsh Government's financial settlement for 2021/22 and beyond, mean that it is increasingly challenging to deliver the resources that would be required to implement the vision set out in the legislation while pressures are so acute.

Any other barriers to successful implementation of the Act

18. The UK's departure from the European Union (and the uncertainty around whether a deal will be struck, and if so, what that means for the Welsh Government and NHS Wales), alongside pressures across the system as both a direct and indirect result of the COVID-19 pandemic, are both potential barriers to the further implementation of the Act.
19. In relation to COVID-19 pressures, NHS Wales organisations recognise the increasing evidence base that suggests under-represented groups, particularly BAME groups and the most economically deprived groups, have experienced disproportionately poor outcomes since the beginning of the pandemic. Our members are considering how they can further support deliver a more equal Wales and the impact COVID-19 has had on population health.
20. Our members feel that delivering on the Act should not be 'de-prioritised' due to COVID-19 and/or EU transition pressures – rather, there is opportunity here to embed some of the ways of working that the legislation puts forward in NHS Wales' collective response to these challenges and an opportunity to reset the NHS to make it sustainable in the future.

How to ensure the Act is implemented successfully in future

21. NHS Wales organisations feel that placing the Act 'front and centre' of all future legislation and policy guidance would be a helpful step towards supporting public bodies to implement the Act in future. This needs to be done alongside increasing awareness of the Act, and the vision it serves to deliver, on a local level. This means engaging more closely with the wider public sector (e.g. schools and community groups) to increase public understanding. The idea that everyone has a role to play in implementing the Act and realising its benefits needs to be upscaled and sold more widely. To do this, consideration could be given to a Well-being of Future Generations (Wales) Act 2015 Citizen Panel.
22. As mentioned previously, the provision of more focused support (whether it be financial or more practical) from Welsh Government would be welcomed by NHS Wales organisations to support the delivery of the Act in future. This support should, above all, seek to embed an understanding on a Health Board level of what experience, knowledge and skills are required to implement the requirements of the Act to the fullest possible extent. In the short-term, this could likely be simply a matter of building additional capacity into the system.
23. Health Education and Improvement Wales (HEIW) has worked closely with Social Care Wales to produce the first integrated health and social care workforce

strategy, which was published in October 2020. Among the objectives of the strategy is to build on the foundations of the Well-being of Future Generations (Wales) Act 2015 to create an engaged, healthy, flexible, responsive and sustainable workforce for the future that is reflective of Wales' diverse population, Welsh language and cultural identity. HEIW is recognised by the Welsh Government as a component part of implementing the Act despite the fact that the organisation is not listed among the public bodies that the legislation applies to directly.

24. Finally, it should be recognised that while the legislation is applicable to public bodies in Wales, the private sector, and other sectors not named within the Act, also have a responsibility (even if not a legal one) to support the implementation of the Act through, for example, ethical business practices and procedures that support employee wellbeing and support employment in local areas, which has an indirect but well-defined link to population health. For example, the Welsh Ambulances Services NHS Trust (WAST) is not named specifically in the Act, but since the Act was introduced, WAST has been implementing the principles of the Act across the organisation and in their core business. It is suggested that the Future Generations Commissioner's office could leverage support among private sector organisations in this space.

Additional comments

Welsh NHS Confederation MOU with the Arts Council of Wales

25. The Act has provided the NHS, and the Welsh NHS Confederation, with the legislative framework to work in partnership with a range of organisations to support the prevention and wellbeing agenda. For example, in September 2017, the Welsh NHS Confederation and the Arts Council of Wales signed our first Memorandum of Understanding (MOU) to support both the NHS and the arts to further embed the five ways of working within the Well-being of Future Generations (Wales) Act 2015. We have been working in partnership with the Arts Council of Wales to develop joint areas of work in furtherance of the shared goal of improving the awareness of the benefits that the arts can bring to health and well-being and creating a more equal, cultural and more sustainable Wales as required within the legislation.
26. We recently [published](#) a short infographic which summarises what has been achieved during the first MOU and signed our [second MOU](#) earlier this month. The second MOU further develops our partnership working and emphasises how we can work together to raise awareness with the people of Wales around the benefits of being creatively active for people to enjoy and lead more active, more equal and healthier lives. As the Arts and Health Co-ordinator at Swansea Bay University Health Board recently stated, "*What can be achieved by working in partnership and across sectors is exponentially greater than what we can achieve alone.... As one patient said to me recently, 'Having live music on the hospital wards is the biggest transformation in health in years'. I call it bringing disruptive joy*".

Conclusion

27. Since the Act was introduced, NHS organisations have been working to deliver innovative care models which help to create long-lasting and positive change to current and future generations. While NHS organisations are maximising their contributions to the seven well-being goals, they are also delivering against a backdrop of significant pressure on their Emergency Departments and primary and community care services to support people with COVID-19, and long-COVID, and treat people with complex needs or long-term conditions. This increase in demand means the NHS needs to continue to adapt and focus on innovative models of care, working across the public sector, to ensure our communities are brought closer together, with early interventions and prevention at the heart of what we do.