	The Welsh NHS Confederation response to the "Strengthening Local Government: Delivering for people" Green Paper
Contact	Nesta Lloyd – Jones, Policy and Public Affairs Manager, the Welsh NHS Confederation. Nesta.lloyd-jones@welshconfed.org Tel: 02920 349857
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Introduction

The Welsh NHS Confederation, on behalf of its members, welcomes the opportunity to respond to the "Strengthening Local Government: Delivering for people" (from now on referred to as the Green Paper).

Whilst the focus of the Green Paper is on local government, there are important implications for health and well-being that also needs to be considered. Subsequently it is important to ensure that partnerships between local government and health are maintained and maximised in any new structures, as highlighted within the Parliamentary Review of Health and Social Care, published in January 2018, and the recent Welsh Government Plan, "A Healthier Wales: our Plan for Health and Social Care", published on the 11th of June 2018.

The Welsh NHS Confederation represents the seven Health Boards and three NHS Trusts in Wales. The Welsh NHS Confederation supports our members to improve health and well-being 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.

Summary

In our response to the Green Paper we are not providing specific answers to the questions posed. We are pleased that the Green Paper recognises the recent vision within the Parliamentary Review of Health and Care, the importance of integration between health and social care and the need for regional working on Local Health Board footprints. As highlighted within the Green Paper it is "important to ensure we do not cut across other service boundaries" and that the options explored within the Green Paper in relation to mergers will ensure alignment with the boundaries that other public services operate on. Furthermore, the recent Welsh Government Plan, "A Healthier Wales: our Plan for Health and Social Care", clearly sets out a long-term future vision of a "whole system approach to health and social care" and the important role that Regional Partnership Boards (RPBs) will play in driving change in health and social care through providing a strong oversight and coordinating role.

However, while we support the Green Paper, like previous White Papers and Bills introduced by the Welsh Government in relation to local government reform, the Green Paper focuses too much on structures and boundaries and not on the outcomes it is trying to achieve; improving the way all public services are governed and delivered in Wales that will improve outcomes for the population of Wales.

The need for integrated public services

As highlighted within our response to the Parliamentary Review on Health and Social Care, there is a need for wholesale change in services to ensure that there are positive outcomes for patients, a reduction in health inequalities and to help people avoid hospital admission through improved community and social services. To achieve these outcomes it is vital that health is not seen as a stand-alone issue therefore we are pleased that each of the options around the future footprint of local government within the Green Paper must be consistent with ensuring alignment with the boundaries other public services, including Local Health Boards.

Integration is a means to an end – providing patients with a seamless service at the right time and in the right place. It is about getting all parts of the system working together so that the patient receives quick, efficient and effective care with the right outcome. To achieve this, we need to get services working seamlessly together in health and social care, but also within primary and secondary care, and physical and mental health services. Integrated services lead to better user satisfaction, better outcomes and when implemented effectively, make better use of resources.

The health and well-being of the population is not the sole responsibility of the NHS - everyone must come together to play their part. At the same time, the NHS must build on its ability to work with others in order to provide services which are not only person-centred but also help to reduce health inequalities and improve patient outcomes.

Engagement is necessary with all our public service colleagues, from social care to housing, education and transport, to take us all from an 'ill-health' service that puts unnecessary pressure on hospital services, to one that promotes healthy lives and improves population health and well-being. All public bodies in Wales must build on how we might improve our ability to work together and support our partners and colleagues in other sectors. To quote the Chief Medical Officer for Wales, "Good health depends on much more than the provision of good health services. The way a society is organised; it's economic prosperity; a person's early life chances; their education and employment opportunities; community support and cohesion; the food we eat; the homes in which we live and many more factors make up the wider social determinants which impact on the health of both an individual and the nation".

Our members are keenly aware of the need for whole system change within public services. But as providers of healthcare, we cannot afford to lose sight of the challenge posed by demographic changes and forecasted increases in the older population. As a service we are driving to ensure access and sustainability of health and social care services, and to see a consistent increase in quality whilst securing the sustainability of these services in meeting this demand.

We support the Green Paper's recommendation that "larger Local Authorities, working as part of larger Public Service Boards (PSBs), should support effective parallel working with Regional Partnership Boards (RPBs), which operate on the health board footprints". The Welsh NHS Confederation believes that Wales, given its size, structure and close links, has a golden opportunity to achieve so much when it comes to providing seamless patient centred care. A significant opportunity to do this comes from the Social Services and Well-being Act 2014 and

the Well-being of Future Generations (Wales) Act 2015 e.g. through the development of PSBs and RPBs. However, more can be done to harmonise the health and care sectors to provide seamless services for Welsh citizens. As recommended within the Parliamentary Review report "The Welsh Government should reflect on the existing RPB and PSB arrangements, and identify and implement governance changes to better harmonise the health and social care sectors in support of seamless models of care delivered at local level". Through the publication of the Welsh Government "A Healthier Wales" Plan there is an opportunity to progress and implement a whole system approach to health and social care.

<u>Public Services Boards could collaborate across Local Health Board Boundaries</u>

We are pleased that the Green Paper has considered our feedback in the White Paper in relation to PSBs being encouraged to collaborate with each other on common themes at a regional level. We support that PSBs will continue to be able, and encouraged, to work on a regional and national basis with other PSBs on areas of common interest and support effective parallel working with RPBs, which operate on the health board footprints. We support conditions which help progress effective local partnerships and where these subsequently enhance the health and well-being of the population. Public services do need to work together to ensure seamless services for citizens to make a visible difference for local citizens.

Regional working

The workforce is the most valued asset in public services, and areas such as recruitment, training, development and learning, secondments and shared administrative and support services may benefit from a more regional approach. The Williams Commission recommended that "Urgent action is required to ensure that seamless, integrated and high-quality health and social services are provided across Wales". In the light of this we have been concerned that Welsh Government's response to the Commission has been a missed opportunity over the last four years.

To enable all public-sector bodies to tackle the pertinent issues affecting Wales, all sectors need to work in a more collaborative and integrated way and the NHS in Wales is already well on the road to integrating health and social care services. For example, the Welsh NHS Confederation, in partnership with ADSS Cymru, has been working to help build a much greater common understanding between NHS Wales and Local Government about the process of, and planned impact from, much closer collaboration and integration. In addition, Welsh Government's Integrated Care Fund is supporting projects which reflect this partnership. We feel that these initiatives demonstrate that services are already moving towards working in a more integrated way, and that this could be better reflected.

The NHS in Wales supports integrating health and social services and we fully recognise that the way services are delivered now is not sustainable, and more importantly does not always meet the needs of the people of Wales. We are pleased that the Welsh Government "A Healthier Wales Plan" states that Health Education and Improvement Wales (HEIW) and Social Care Wales (SCW) will be commissioned to develop a long-term workforce strategy in partnership with NHS and Local Government, the voluntary and independent sectors as well as regulators, professional bodies, and education providers.

Public engagement

There is an urgent need for a meaningful dialogue with the public about the future of public services, their expectations of these services and the different role they need to play. This is vital because evidence shows that public support is critical to delivering and securing policy and behaviour change. Programmes that are most successful in galvanising public support are those which place the public at the heart of the decision-making process. In Wales we now have the legislative framework we need in the form of the Well-being of Future Generations (Wales) Act 2015 and the Social Services and Wellbeing (Wales) Act 2014, but we still need to win the hearts and minds of the Welsh public.

We are pleased that the Welsh Government "A Healthier Wales" Plan highlights the importance of public engagement through collaborative, continuous and holistic engagement and that the Welsh Government will develop a comprehensive engagement programme. There is a requirement for an open and honest conversation with the public about what the NHS and social care can provide in future. While the NHS is free at the point of contact, it is not free of obligation, and the public will need to be supported in taking more responsibility for their own health. The NHS belongs to us all, and as individuals, we should do what we can to ensure it is sustainable, both now and in the future. There is a need to build on existing engagement/communications relationships and channels at all levels, including Regional Partnership Boards and Public Service Boards

Complexity around partnership structures

Public sector relationships are overly complex, and this complexity does not serve Wales well. This is a particular issue for Health Boards, most of which work across several Local Authorities, and indeed for the NHS Trusts, that work across Wales, all with several delivery partners. Undoubtedly, the complexity of boundaries and structures in public service delivery in Wales does cause problems, but addressing these is only part of the solution, and must not be seen as an end in itself.

As the Green Paper highlights presently in Wales public sector bodies are working in collaboration through a range of different structures and it is important that these are streamlined and made easier for public sectors bodies to navigate, especially Health Boards and Trusts who have to work with a range of partners.

The Well-being of Future Generations (Wales) Act 2015 provides the impetus for a step change in the way that public bodies operate, both individually and collectively. The public bodies subject to the duties of the Act are working towards the same goals, however organisational legacy, knowledge base, culture and experience means that the outcomes are being approached from a wide and varied baseline with no single common starting point/ outcome and essentially continuing in an historic, sector by sector manner (not in line with the five ways of working).

In addition to the Act, there are changes occurring in the way public services need to be organised and delivered in the future with City Deals and other Regional approaches being developed, all of these will require a more collaborative, integrated and cohesive approach from all sectors, in response.

The range of structures are:

- Regional Partnership Boards: When the Social Services and Well-being (Wales) Act 2014 was introduced the NHS in Wales supported the introduction of RPBs. The Social Services and Wellbeing (Wales) Act 2014 required partnership arrangements to be made in each Local Health Board area, under the direction of a RPB. The RPBs have representation from Health Boards, Local Authorities and service users. These RPBs have been established for defined functions, focussed particularly on areas where successful integration between local government and health is essential for the provision of effective services for citizens. The Social Services and Well-being (Wales) Act 2014 and supporting statutory guidance requires joint planning, commissioning and the use of pooled budgets between health and local government.
- Public Services Boards: The NHS are an active partner since PSBs. PSBs have a unique role in bringing together the wider public service to improve the economic, social, environmental and cultural well-being of their areas. The Welsh NHS Confederation supports conditions which progress effective local partnerships. Our members work to build meaningful relationships with key partners but they do report that there is a real variance in the role and visibility of PSBs in each area. Whilst we support the role of the PSBs in nurturing sustainable, effective partnerships we would highlight this variance as a potential barrier to realising a consistent outcome in utilising the PSBs. With regard to the Local Well-being Plan we feel there is a need to ensure these are explicitly linked with the Integrated Medium-Term Plans, which is not consistently done.
- City Deals: As well as regional partnerships, Local Authorities and Local Health Boards are building the broader regional partnerships designed to nurture economic development which are emerging from the city deal and city region approaches. Purposeful regional arrangements around the Cardiff Capital Region City Deal, Swansea Bay City Deal and the North Wales Economic Ambition Board are taking shape. The City Regions cover a number of Local Authorities but it also important to recognise that they also cover a number of large Health Boards areas.

We believe that 'form follows function', and a key issue for the delivery of Welsh public services is how we work towards a 'common purpose' and a common outcome, rather than organisational need and competing legislative and policy frameworks. The common outcome must be the vehicle which enables us to achieve our purpose and achieve the necessary outcomes. The "A Healthier Wales" Plan sets out a vision of a "whole system approach to health and social care" and it is vital that the current boundary and structural complexities are overcome to achieve this whole system seamless approach.

Conclusion

Through a systems approach - sharing our collective assets, following the principles of sustainability and prudent healthcare and complying with our unique legislation, the Wellbeing of Future Generations (Wales) Act 2015 and Social Services and Well-being Act 2014, we have the opportunity and responsibility to work collaboratively across sectors and organisations. It is essential to listen to and empower our people, and to appreciate the assets within our communities, allowing them an equal part in all decisions and plans for their life, health and happiness.