
Ymateb i Ymgynghoriad / Consultation Response

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Dyddiad / Date:	30 August 2019
Pwnc / Subject:	Together for Mental health delivery plan

Background information about Estyn

Estyn is the Office of Her Majesty's Inspectorate for Education and Training in Wales. As a Crown body, Estyn is independent of the Welsh Government.

Estyn's principal aim is to raise the standards and quality education and training in Wales. This is primarily set out in the Learning and Skills Act 2000 and the Education Act 2005. In exercising its functions, Estyn must give regard to the:

- Quality of education and training in Wales;
- Extent to which education and training meets the needs of learners;
- Educational standards achieved by education and training providers in Wales;
- Quality of leadership and management of those education and training providers;
- Spiritual, moral, social and cultural development of learners; and,
- Contribution made to the well-being of learners.

Estyn's remit includes (but is not exclusive to) nurseries and non-maintained settings, primary schools, secondary schools, independent schools, pupil referrals units, further education, adult community learning, local government education services, work-based learning, and teacher education and training.

Estyn may give advice to the Assembly on any matter connected to education and training in Wales. To achieve excellence for learners, Estyn has set three strategic objectives:

- Provide accountability to service users on the quality and standards of education and training in Wales;
- Inform the development of national policy by the Welsh Government;
- Build capacity for improvement of the education and training system in Wales.

This response is not confidential.

Consultation Questions

Question 1: The delivery plan continues to place a strong emphasis on improving mental health and well-being across all ages, would you agree with this approach?

Yes

Question 2: Could you please provide any further commentary on where you feel the approach works well or where alternative emphasis is required?

- The delivery plan has suitable emphasis on the person-centred care approach. There is an appropriate focus on protective factors for good mental health. The positive commitment to identified areas for cross government working, such as education, employment, and housing strengthen this plan.
- The plan looks at sustainability and identifies 4 workstream priorities, which will run alongside the 2-year plan, and beyond to secure the intended long-term improvements. Although the 'new whole-school approach' to mental health and wellbeing initiatives could strengthen the early intervention and prevention approach, there is limited information currently within the plan on what this will be.
- The plan refers to the joint Ministerial Task and Finish Group as well as the work already underway to augment the new curriculum, however further information or a signposting to additional information on the work to date would be useful.

Within the delivery plan there are a number of priority areas for action, these are:

- Preventing poor mental health and maintaining mental wellbeing
- Improving access to support for the emotional and mental health well-being of children and young people
- Further improvements to Crisis and Out of Hours provision for children and adults
- Improving the access, quality and range of psychological therapies across all ages
- Improving access and quality of perinatal mental health services
- Improving quality and access to services whilst developing recovery orientated services
- Supporting vulnerable group

Question 3: Do you agree with the priority areas identified? Are they fit for purpose?

Yes

Question 4: Could you please provide any additional information to support your response, relating to why you consider the priority areas to be appropriate or suggesting additional key areas or changes you would wish to see?

- The priority areas build suitably on the overarching workstreams, which will also be prioritised beyond the end of this plan.
- There are many opportunities within the 7 priority areas to cross-reference work already underway in education for the implementation of the Additional Learning Needs and Education Tribunal (Wales) Act 2018. These are:

A 0–25 age range

- Health services and education will work together in supporting learners with additional learning needs (ALN) from 0 to 25.
- Local authorities will seek advice and assistance from health professionals, where it is relevant to the individual learner.

- Local authorities and further education institutions (FEIs) can request that the health service consider whether there is a relevant treatment or service likely to be of benefit in addressing the learner's ALN. If there is, the health service must secure it.
- Where the health service believes that a child has (or probably has) ALN, they must bring this to the attention of the appropriate local authority, if they believe that is in the child's best interests.

A unified plan

- Where a relevant treatment or service has been identified, this will be included as additional learning provision (ALP) within the individual development plan (IDP). Such ALP will be evidence-based interventions.
- The statutory Designated Education Clinical Lead Officer (DECLO) will promote consistency and equity to ensure evidence-based interventions to promote better outcomes and reduce inequalities.

A mandatory ALN Code

- The ALN Code will provide guidance on the new ALN system to which health services must have regard.

Clear and consistent rights of appeal

- The Education Tribunal will make recommendations to the health service and about the health aspects of ALP.
- The health service will be required to report to the Education Tribunal in relation to any recommendations to which it is subject.
- While the Education Tribunal may only make an Order that is binding on the local authority in relation to that provision, we would expect the local authority to seek the co-operation of health services in delivering the provision included in the Order. The DECLO will have an important role here.

Avoiding disagreements and earlier disagreement resolution

- Where a child, their parents/carers, or a young person is unhappy with an assessment, treatment or service provided by the NHS, they could raise their concerns through the NHS Putting Things Right process. The DECLO will also have an important role.

Increased collaboration

- The duty on the health service to secure specific ALP contained in an IDP will ensure there is clarity and certainty around the delivery of provision.
- The creation of the DECLO in each health service will help strengthen liaison and joint action between the health service and the local authority. (1)
- These key actions for health identified as part of the Act will have implications on the Delivery Plan, which could be more clearly identified within the priority areas.

In addition to the priority areas, we also have a number of overarching work streams which will also need to be prioritised but will continue beyond the life of this plan. These include:

- Implementing the core data set to improve consistency, robustness and the focus on outcomes across all-age mental health services.
- Developing a workforce plan in partnership with the NHS Mental Health Network and Health Education and Improvement Wales (HEIW) to support medium and longer-term services improvements and to ensure a stable and sustainable mental health workforce.

- Strengthening service user and third sector engagement across policy and service improvements.
- Improving access to welsh language mental health services.

Question 5: Do you agree these are appropriate work streams to prioritise?

Partly

Question 6: Could you please provide any additional information to support your response, relating to why you consider these work streams should be prioritised or suggesting additional work streams or changes you would wish to see?

- The four workstreams are too heavily biased towards health. The plan outlines the need for cross working and early intervention which is person centred, however, there is insufficient detail and reference to these themes within the current workstreams.
- The workstreams would be strengthened further with additional reference to curriculum and ALN reform and how these key changes could be used as a vehicle to support the 7 priority areas and 4 workstreams.

Question 7: Within each key theme, we have identified a number of key actions and milestones. Do you feel these are the right ones?

Priority 1: Preventing poor mental health and maintaining wellbeing.

- The descriptor on page 6 and page 10 do not give the same message. This is an important priority. We wonder whether it has been developed based on the evaluation and outcomes from plans 1 and 2. There is no reference to these prior plans and how they have been used to inform the 7 priorities going forward.
- Within priority 1 there are 4 key themes, not sure, if the key themes have been developed based on outcomes from plans 1 and 2.
- Based on priority 1 focusing on preventing poor mental health it would be beneficial to have a key theme, which focuses on early intervention.
- Presently there is a lack of continuity between the key themes identified, 'what needs to be done' and key milestones. The section on 'what will be different/how will we know is still under development for the most part. It is unclear what the intended outcomes for the priority are likely to be and the range of evidence that would be utilised. For example, disseminating best practice guidance and tools on whole school approaches to mental wellbeing and resilience, including ACEs is not considered under key milestones or under the impact section of the theme.

Priority 2: Improving access to support the emotional and mental health wellbeing of children and young people

- Key themes are appropriate. In the first key theme the actions of developing and implementing a multi-agency whole school approach and the introduction of professional learning for all levels of school staff on mental health and emotional wellbeing, should be considered in the context of the curriculum changes schools are facing and the ALN Reform and transformation agenda.
- In key theme 2 2.2iii a critical development. The current concern is a lack of qualified specialist practioners in the field to carry out this role. Does the Welsh Government have a strategic recruitment policy to facilitate this action?
- The 'what will be different/how will we know' section many of the evidence bases identified would be appropriate. This priority could be strengthened with additional

reference to managing the effects of substance misuse across schools and the impact of this on children and young people's mental health and wellbeing. Consideration could be made to the influence of online activities and the impact these are having on children and young people's mental health and wellbeing.

Priority 3: Further improvements to crisis and out of hours for children and adults:

- Clear key themes and appropriate actions give a good overview of the proposed actions for improvement

Priority 4: Improving the access, quality, and range of psychological therapies across all ages.

- Only one key theme identified. The priority would benefit from further explanation of what an 'outcomes focused practice pilots to improve use of experience information in health boards' is.
- It may also strengthen the priority area to have more cross reference to priority 7 for vulnerable learners and to priority 2 to include education more fully in the approach.
- There is little reference to the work already started in schools on the ACEs agenda, which may be of benefit in this priority. The guidance to schools discussed as an action in priority area 2 could be used to influence the intended actions more thoroughly in this priority.

Priority 5: Improving access and quality of perinatal mental health services

- Clear key themes and appropriate actions give a good overview of the proposed actions for improvement.

Priority 6: Improving the quality and developing recovery orientated services

- 4 key theme areas. In key theme 4, it would strengthen the development of community mental health teams (CMHT) to include education as a clear stakeholder in the development. Further explanation on the role of the CMHT would be useful and how these will be coordinated across Wales.
- Health boards and the regional consortia arrangements differ so this needs to be considered to ensure joined up working practices between health, education, and local authorities.

Priority 7: Supporting vulnerable groups:

- 3 key themes in this priority. Further clarity over the term vulnerable groups would be useful in ensuring consistency so that all sectors understand the range of vulnerabilities to secure equity and clarity on the services available for this specific group.
- Currently eating disorders, mental health co-occurring with substance misuse and offenders have been identified for specific actions. There is currently no reference to the role of education within any of these 3 identified groups.
- The 'what will be different/how will we know' area is still under development. At this point the information within this area focuses monitoring admission figures overall, there is little information on the wider impact evidence identified currently.

Question 8: If there are any key actions or milestones that we are missing can you tell us what you feel is missing and what you recommend we add?

- The main areas have been identified in question 7 in more detail.
- The two aspects which are underrepresented presently in education are around opportunities to influence curriculum development and the implications of the Additional Learning Needs and Education Tribunal (Wales) Act 2018

Question 9: In your view, does the proposed Delivery Plan link well with other relevant policy and service areas?

Partly

Question 10: Please can you provide further commentary on where you consider the Delivery Plan to link well with other policy and service areas, and tell us how you think the Plan could link better with other areas?

- There are around 10 Acts and plans referred to throughout the Delivery Plan. It would be useful to have the key priorities and messages from this wide range of information cross-referenced to the Delivery Plan for clarity. Duplication and gaps would be clearly identified. This approach would provide an effective joined up approach for stakeholders to use and to see where other sectors are able to contribute to meeting actions specific to their areas of expertise.
- The Delivery Plan clearly states that mental health is 'everybody's business' this would go some way to ensuring messages are clear and consistent across all Acts and plans from the Welsh Government.
- The Additional Learning Needs and Education Tribunal (Wales) Act 2018, is referenced on page 8, key features of this Act could be more prominent within the delivery plan especially in priority areas 1, 2 and 7.

Question 11: In your view, which elements of the proposed delivery plan are likely to have the greatest impact?

Priority areas 1, 2 and 7 are likely to have the most impact targeting preventative work and specific high-risk groups. However, all 7 priorities are inter linked and should not be viewed in isolation of one another for maximum effect.

We would like to know your views on the effects that the 'Together for Mental Health Delivery Plan 2019-22' would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favorably than English.

Question 12: What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

- This is an important issue especially for anyone already having mental health issues or in crisis that they should be able to communicate through their first and most comfortable form of communication, be that Welsh or sign language. Within the Additional Learning Needs and Education Tribunal (Wales) Act 2018 NHS bodies will have a new duty to decide whether a treatment or service (that is likely to be of benefit in addressing the ALN of a child or young person) should be provided in

Welsh and, if so, to specify that in the IDP and to take all reasonable steps to secure that provision.

Question 13: Please also explain how you believe the proposed delivery plan could be changed so as to:

- **have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language,**
- **have no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.**

- The appropriate targeting of resources based on need would be an effective approach. Further information on this workstream would need to be available for us to give a more informed opinion.

Question 14: Do you think the actions contained within the delivery plan will provide a positive impact for people with the following protected characteristics:-

- **Disability**
- **Race**
- **Gender and gender reassignment**
- **Age**
- **Religion and belief and non-belief**
- **Sexual orientation**
- **Human Rights**
- **Children and young people**

Yes

Question 15: Please can you provide further information as to how the actions will provide a positive impact for people with protected characteristics or where you consider improvements could be made?

- To enable a wide range of stakeholders to understand the complex issues which manifest themselves under the term of mental, health, it is important that there is more detailed and additional information for how people with the protective characteristics listed above might be effected by the Plan. This additional information would need to be included fully in all professional development or training materials which may be rolled out as part of the Delivery Plan.

Question 16: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

The main areas for consideration are:

- Reference to Additional Learning Needs and Education Tribunal (Wales) Act 2018 and the implications this will have on the Delivery Plan
- Include in priority area 1 by strengthening the key themes to have a focus on preventative work and early intervention.

(1) Welsh Government Fact Sheet Additional Learning Needs and Education Tribunal (Wales) Act 2018

