

Making Wales a No Wrong Door Nation - how are we doing?

February '22



**Comisiynydd
Plant Cymru
Children's
Commissioner
for Wales**

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Introduction

Introduction by Professor Sally Holland, Children's Commissioner for Wales

In 2019-20 my team and I visited every Regional Partnership Board in Wales to find out how services were working together to support children with complex needs. As a result, I made a call for every region to adopt a 'No Wrong Door' commitment so that children and their families would not get bounced between services or get doors shut in their faces. In autumn 2021 we visited again and this follow-up report is about what progress has been made.

- Ethan, 11, has a mild learning disability and his school have recently referred him for a neurodevelopmental assessment as they think he may have autism. He has recently been expressing suicidal thoughts. The local Single Point of Access team in the health board's Child and Adolescent Mental Health Service have arranged a joint appointment for Ethan with a paediatrician and a psychiatrist. Their Early Intervention Service have met his parents and his school to give advice and training on consistent support and responses for Ethan.
- Elen, age 14 has had lots of worries since her Dad died of Covid 6 months ago. She's been drinking alcohol and has been excluded from school recently after punching another pupil. Her school have referred her to a local wellbeing panel and within two weeks she has seen a primary mental health worker, been offered a support group for bereaved children and her mother has been offered parenting support.
- Grace, 16, has Downs Syndrome and complex physical health needs. A transitions key-worker from a third-sector project, which is jointly funded by the local authority and health board, supports Grace and her parents plan her future health, education, care and housing needs. The key-worker ensures that the plan is co-ordinated across all services.

These are examples of what a No Wrong Door approach looks like. For many children and families in Wales this is not yet their experience when seeking support, but there are examples of this happening already. We have no excuse not to be aiming for No Wrong Door to be the norm everywhere in Wales.

No Wrong Door touches on many children's human rights under the United Nations Convention on the Rights of the Child (UNCRC), including article 24 — the right to the best possible standard of healthcare; article 20 — the right to special help if a child does not live with their family; and article 23 — the right to special care if a child has a disability or mental health issue. It is the job of Regional Partnership Boards (RPBs) to bring services together to meet children's needs, with a particular duty for children with complex health and social care needs.

I begin by thanking every Regional Partnership Board in Wales for your engagement with us. Each Board dedicated time and resource to responding to our requests for information and to meet directly with the Board. The period since March 2020 has been unlike any other in our lifetimes, and those who sit around

the RPB tables are often those at the coal face of service delivery which does its best to keep our children and young people safe, healthy and happy. I would like to pay tribute to the work you do, and thank you for sparing some of your time to meet with me, and to respond to my recommendations in the constructive way you have.

I'd also like to pay particular thanks to the young people who have contributed to this project and advised both me and the Deputy Minister for Mental Health and Well-being on their priority areas for action by RPBs. The young people were well supported by T4CYP, Children in Wales and Our Minds our Future Wales, to play a full and active part on a series of important meetings and discussions, and their contributions have been invaluable in shaping our report and recommendations.

The impact of the pandemic on services for children and young people is far reaching and severe. Understandably, this has affected the RPBs' ability to deliver on some of their plans. However, I have to say I have been impressed overall by the Boards' commitment to the continued delivery of children and young people's services and to maintain some headspace for future planning on how to create a No Wrong Door approach for Wales.

There are areas, however, where I am disappointed not to have seen further progress, and I will outline these further on in this report.

As well as recommendations to RPBs, I also asked Welsh Government to respond to a set of recommendations. Again, given the huge pressures on the government and our public services at this time, parts of their response has been impressive. There are of course key areas where I think Welsh Government could do more, which I will also outline here.

Tricky words

In this report we will mention lots of different organisations and experiences. Some of the words may be tricky, so we've created a list of tricky words here for you to check your understanding.

Regional Partnership Boards (we will mostly say RPB)	The Boards work to find out what the needs of the people in their region are, and to bring health, social services, education and other services together to meet their needs.
Children's Commissioner for Wales	Sally Holland is the Children's Commissioner for Wales. Sally's job is to make sure all children and young people in Wales get their children's rights.
United Nations Convention on the Rights of the Child (UNCRC) We will also say Children's Rights.	The UNCRC is a list of rights all children and young people have. Children's Rights are the things you need to grow up feeling happy, healthy and safe
The Together for Children and Young People Programme (you might see it written as T4CYP)	The Programme was set up to improve the emotional wellbeing and mental health services / support for children and young people in Wales. The people working for the Programme created the NEST / NYTH framework.
NEST / NYTH	NEST stands for Nurturing; Empowering; Safe; Trusted. NYTH = rhoi Nerth; Ymddiried; Tyfu'n ddiogel; Hybu. NEST / NYTH is the name of a plan for every region of Wales to create a wraparound support system for children and young people's mental health and wellbeing. It aims to make expertise and advice quicker to access, and to support adults supporting children to have the tools they need to help.
Region	There are 7 RPBs for 7 regions of Wales — these are the areas which each RPB works in. They cover the same areas as Health Boards
Local Authority (you might see it written as LA)	Responsible for delivering public services in your local area
Local Health Board (you might see it written as LHB)	Responsible for health services in your local area
Mental Health and wellbeing	Good mental health means being generally able to think, feel and react in the ways that you need and want to live your life. But if you go through a period of poor mental health you might find the ways you're frequently thinking, feeling or reacting become difficult, or even impossible, to cope with.

	Wellbeing is a state of being comfortable, healthy and happy.
Complex needs	<ul style="list-style-type: none"> ○ Children with disabilities and/or illness ○ Children who are care experienced ○ Children who are in need of care and support ○ Children who are at risk of becoming looked after ○ Children with emotional and behavioural needs.
Additional Learning Needs (ALN)	Having a learning difficulty or disability which means they need extra support for their learning
No Wrong Door (or NWD)	The approach the Children’s Commissioner has called for, for young people to get the help they need wherever they ask for it — so they aren’t told they’ve knocked on the ‘wrong door’
Population Needs Assessment (or PNA)	Each Board has to assess the need for services and how those services and provided in their area up to 2027, and prepare a report by April 2022.

What we did

In 2019/20, we visited every RPB in Wales to find out what they were doing to support children and young people, particularly those with complex needs, in their region. In June 2020 we published our report on the findings from those visits called [No Wrong Door — bringing services together to meet children's needs](#).

Between July and November 2021, we requested written updates from every RPB on their No Wrong Door plans in relation to that report's five recommendations, and met again with every RPB in Wales. As well as requesting written responses to our recommendations, we also asked them to respond to three examples of real life experiences of children and young people who had not received the joined up service they should have (drawn from our [Investigations and Advice service](#)), setting out how their Board's ongoing work and future plans will make a difference to prevent these bad experiences happening to other children and young people.

For part of this project, we have worked alongside the NHS improvement Programme Together for Children and Young People (T4CYP), as they have developed their [NEST / NYTH Framework](#), which is designed to support RPBs and all partners in a whole system approach to bring services together to support children and young people's mental health and wellbeing. The key principles of this framework include a No Wrong Door approach, and we believe this framework reflects our priorities for creating a service which designs services to wrap around children and young people's needs, rather than expecting children and young people to fit into existing services.

In November 2021, we teamed up with the T4CYP programme to work with a group of young people to discuss *No Wrong Door* and the NEST / NYTH Framework. The young people came up with a set of priorities for mental health and emotional wellbeing, and a series of questions for the RPBs about their plans. On 30 November 2021, the young people were then able to [put these questions](#) directly to representatives of every RPB in Wales.

The following week, in early December, the young people met the Deputy Minister for Mental Health and Well-being, Lynne Neagle MS and presented to her what they had heard from RPBs. They also asked her lots of questions about what she and the Welsh Government are doing to improve these services.

This report sets out a series of key findings from the meetings with the Boards, plus what we want RPBs and the Welsh Government to do next.

Annexes 1 and 2 set out in more detail how RPBs and Welsh Government are progressing in responding to each of our recommendations. Annex 3 lists our formal recommendations from this report.

What we found

- Every RPB has a plan for children's provision, and has begun to make changes towards a No Wrong Door approach.
- Every RPB now has a group dedicated to children's issues, which reports in to the main Board.
- There are some really encouraging examples of taking a No Wrong Door approach which include:
 - Several Boards have improved how children's mental health professionals support and train up other professionals in places like schools and social care.
 - Some Boards have plans to create new 'sanctuary' or drop-in centres for children experiencing a mental health or acute emotional distress.
 - Most Boards have plans to create new places to stay overnight or for a few days if they need it, for children and young people with complex needs, or who are experiencing a mental health crisis. These will help to avoid children being admitted to hospital, or being placed many miles away from home, when this is not necessary or in their best interests. Some of these plans are advanced and the new provision will begin in 2022.
 - In several regions, children's mental health crisis teams have extended their operations. In some areas this means they will operate 24/7, which is very welcome, especially given the current difficulties around recruitment of NHS staff.
 - Most Boards have, or will soon have, new systems for supporting children with Learning Disabilities who are making the transition from children's to adult services.
 - Most Boards have plans for new therapeutic accommodation for young people with complex mental health and social care needs who often have to move a long way from home to be looked after currently. Their start-up costs receive direct funding from Welsh Government and some will open in 2022.
- Some Boards could tell us how they themselves have worked directly with children and young people, and how they have made information about services more accessible. One Board has a shadow RPB made up of young people, for example.
- We are pleased with the development of the new NEST / NYTH framework, designed to support RPBs to deliver a 'whole system approach' meaning that children and young people get the right support from the right people, first time. The NEST/NYTH framework includes No Wrong Door as one of its key principles. Boards have engaged positively with the new NEST / NYTH framework and all have a plan to work within this framework.

Key barriers holding back a No Wrong Door Wales

- Children and young people are still, every day in Wales, being told they have come to the wrong door when they reach out for support with their mental health, emotional or behavioural needs. We know this from our own case work service and also because RPBs themselves report this.
- We continue to have a situation where children with the highest level of need receive a service that does not meet their needs because health and local authorities cannot agree on the placement and the 'Continuing Care' funding required. Others face lengthy delays while funding is agreed and this is being discussed in their presence. There is [Welsh Government guidance](#) that says agencies **must** work together where continuing care is needed for children, but it only says that local health boards (LHBs) and local authorities (LAs) *may* jointly fund the care, which in practice is leading to regular disagreements, which leave children and their families in limbo and without the support that has been assessed to be required. It was striking that every Regional Partnership Board reported that they have not solved this issue. This is completely unacceptable. We think Welsh Government needs to step in and prevent this from happening; current guidance is not having sufficient impact on children's experiences.
- Boards have committed to creating new safe accommodation for children and young people with complex needs. This is very welcome. However, at this stage these are mainly assessment units providing short term support while a further placement is arranged. We think that there may be a need to develop some longer-term provision for those young people who cannot be successfully supported to return home or to foster care.
- Waiting times for an assessment for a neurodevelopmental condition (for children with suspected Autism, ADHD and other similar conditions) are extremely long, and in the meantime children and their families can receive very little if any support. There are some good plans being developed at a national level on this, but in the meantime plans for improving support within the regions is patchy.
- When children may have *both* a neurodevelopmental condition *and* poor mental health they often receive a very disjointed service, despite this being very common.
- Regions have different views on what the RPB's role is. They should have oversight over the services in their region and make plans for delivering - making sure different parts of the region learn from other areas' good practice, and making sure services are joined up to meet complex needs. Some seem to focus more on responding to national funding opportunities than on having a strategic overview, but this is improving in most areas.

- Despite shared learning events being organised, members of the RPBs were often unaware of developments in other regions or areas within their own region, which may help them with their own No Wrong Door approach. This included plans for new safe accommodation where some RPBs felt barriers were significant, and would like to learn from others how arrangements have been brokered in their region.
- Not all RPBs are yet in a position to confidently deliver the NEST / NYTH framework as part of their current operations. They need ongoing support, and to be properly monitored to make sure they are delivering. This needs to be organised by Welsh Government. The extension of the T4CYP programme to September 2022 is a welcome step in this regard.
- Clearly there are other systemic issues holding back progress, including the current extreme pressure on services, with the well documented issue over recruitment which is affecting many services acutely.

What we want RPBs and Welsh Government to do now

Our analysis of progress against our previous recommendations is included in a separate annex. Here is what we would like all **RPBs to do next**:

- Turn plans into tangible actions. All of the young people we worked with on this project reflected that they heard too much about plans for the future and not enough about service delivery in the here and now. They shared this feedback with the Deputy Minister and her officials, and we expect Welsh Government to hold RPBs to account on this important point.
- Prioritise Continuing Care arrangements for children and young people as a matter of urgency. Board members and senior leads from local authorities and health boards should participate in a Government organised workshop, as recommended below, to find a reliable and swift method to pool funding between their services to deliver suitable and truly joint multiagency arrangements for children with complex needs efficiently and effectively in the best interests of the child. Any barriers from the current guidance need to be addressed by the Welsh Government in conjunction with the Boards.
- Ensure No Wrong Door plans are backed up by clear strategic plans, governance structure, and measurable outcomes which cover early help and prevention, the 'missing middle' not reaching the threshold for specialist support, and those children and young people with the most complex needs.
- Consider the good practice example on the direct participation with children and young people outlined in this report, and the resources produced by our office, to organise direct engagement and coproduction with children and young people to inform their work.
- Continually test their progress by tracking current experiences of children and their families who need support and services. We recommend that contemporary case examples of successes and barriers should be presented at every board meeting.
- Showcase their work for children and young people in a user friendly way on their websites. We encourage all Boards to review and improve how they advertise the work they do online.
- Better advertise plans that are in place for transitions protocols for children with learning disabilities, with suitable accessible resources. Where these regional protocols are not in place yet, they should be prioritised.

Welsh Government should:

- Review their planned response to the Rebalancing Care White Paper in light of this comprehensive update on the progress of RPBs. They should consider in particular the need to create RPBs as 'legal corporate entities' (bodies that can receive money directly and decide how it is spent without referring to other organisations for approval), and to mandate funding arrangements for RPBs. This could be either a national funding framework or by mandating pooled funding (requiring partners like health boards and local authorities to pay a proportion of money towards joint projects, rather than just giving them the option to do this). Without a shift in the funding arrangements, the changes still required, as highlighted by this report, remain unlikely to be achieved. This will continue to affect outcomes and experiences for children with complex needs.
- Strengthen the statutory guidance around the role of citizen, carer and third sector representatives to ensure they are active participants in every region.
- Take the lead on ensuring the service leads in the health board and local authorities in each region produce a comprehensive written agreement in respect of Continuing Care arrangements. This should be supported by bringing together Board members in a workshop attended by senior leads of each relevant service involved in continuing care arrangements to sign up to a written agreement which commits to pooled funding between services to deliver suitable multiagency arrangements for children with complex needs efficiently and effectively in the best interests of the child.
- Review and refresh the Continuing Care guidance following these workshops, so the approach is nationally agreed and locally delivered.
- Provide a detailed plan for how the Welsh Government will support RPBs to deliver a No Wrong Door approach through the NEST / NYTH framework, beyond September 2022. This must include a robust monitoring framework which holds every Board to account, and longer term funding arrangements.
- Support and deliver the joined up approach to neurodevelopmental services which recognises the full spectrum of neurodiversity, as developed by T4CYP.
- Robustly monitor the implementation of the new Transitions and Handover Guidance for health boards.
- Ensuring Learning Disability transitions to adult services are monitored and that RPBs report in to Welsh Government on this specific aspect regularly as part of NEST / NYTH implementation.
- Continue with regular shared learning events for RPBs, including a focus on good practice examples between regions; as well as actively encouraging the upscaling of good practice within regions.

What we will do next

We will continue to follow up on the recommendations we've made in this report, in conjunction with the Welsh Government who formally scrutinise and hold RPBs to account on their progress. We will watch closely the work of the Government and the extended T4CYP programme to ensure that there are adequate mechanisms to continue to hold RPBs to account on their progress in embedding the NEST / NYTH framework and in improving the No Wrong Door access for neurodiverse children in particular.

This work will primarily form part of our core policy influencing work. Alongside this, we will bring forward a casebook of families' experiences to help guide the ongoing T4CYP and Welsh Government work. We welcome the progress that we've been able to observe from our repeat visits but there is more still to do to ensure the No Wrong Door approach is the reality of every child's experiences in Wales, and we are committed to seeing this through.

Annex 1: RPBs' responses to our recommendations from 2020

Recommendation 1: Planning and implementing a No Wrong Door approach

As part of our national response to children and young people's mental health and well-being needs following this period of lockdown, all Regional Partnership Boards should plan and implement a 'no wrong door' approach to mental health and well-being which could include integrated teams, panel and hub models to provide timely joined-up help, drop in centres and plans for integrated residential provision where needed. All Boards should review their current Area Plan to ensure they are taking sufficient action to address the needs of children and young people with complex needs, and that local authorities and local health boards are truly working in partnership towards this. This should include consideration of the Plan in light of the Covid-19 pandemic and how this impacts on the remaining years of the Area Plan, and longer term strategies.

Commentary on RPBs' progress

We are pleased to report that all seven RPBs have plans in place and have implemented parts of a No Wrong Door Approach. The ambitions of these plans, and the extent to which they have already begun to be implemented, varies across the regions. Since our last report, we are pleased to say that all RPBs now have a sub-group specifically for children's issues, as [Welsh Government guidance](#) calls for. Some of these sub-groups are very new and are in the first stages of setting their priorities, while others have their own strategic programmes and delivery plans, with very clear governance links into the main RPB.

We were impressed by some Boards' strategic plans, which we felt really set out a clear plan, with timescales, which were also embedded in the experiences of children and young people. At the other end of the spectrum, we were concerned that there seemed to not be a clear link between an understanding of young people's experiences (which all Boards demonstrated) and how plans will implement changes to benefit young people on the ground, and what the RPBs' role in that should be.

The young people we engaged with were unanimously of the view that they were hearing too much about 'plans' however and not seeing enough concrete or tangible actions and timescales. They shared this feedback eloquently with the Deputy Minister for Mental Health and Well-being in a meeting with her and her officials.

As the case studies below demonstrate, we are seeing encouraging examples of integrated teams, panel and hub models to provide timely joined-up help, drop in centres and plans for integrated residential provision. This is very much welcome, but again the picture in each region varies. In some regions, for example, integrated teams responding to children's needs appears to be well embedded in 'business as usual'. In other regions, we saw the different agencies still clearly working in siloes. It was evident in some meetings that not all RPB members were aware of work being undertaken within their region; which means citizens may also not be receiving information about new services and provision.

In our 2020 report we highlighted [Gwent's SPACE-Wellbeing panel model](#), where professionals collaborate to provide a quick and multi-agency response to children with complex needs when they are first referred. While we were encouraged to hear several Boards talking about panel models, we are not convinced that all of these will reach this group of children and young people in the same way as the Gwent model. However, we are encouraged to hear that some Boards will review the effectiveness of those panel models and consider how to better reach those young people once they have trialled the panels. The RPB members will need to monitor these pilots closely.

Six of the seven Boards had plans up and running for new residential provision which would provide new beds for children with complex needs, and some areas are also commissioning new crisis beds which will be very welcome. These are designed to support children and young people in a therapeutic environment while care is arranged, and aim to avoid unnecessary hospitalisation or an inappropriate placement far from home. This is a very welcome development and in most areas social care and CAMHS are working together on this to ensure that expertise from both services is being brought together to meet the needs of young people.

Unfortunately this innovative working together does not appear to be addressing or resolving the issues we often see at the higher end of need when a child or young person requires a 'continuing care' arrangement. The situations I described in my *No Wrong Door* report of services arguing over children's heads (in some cases requiring a court decision to resolve) as to who should pay for their care show little sign of going away. There is [Welsh Government guidance](#) that says agencies **must** work together where continuing care is needed for children, but it only says that LHBs and LAs *may* jointly fund the care, which in practice is leading to regular disagreements, which leave children and their families in limbo and without the support that has been assessed to be required. Several Boards reported that they feel stuck on this issue and would welcome Government intervention to come up with formulas for swifter, child-centred funding agreements.

We are also pleased to report that most RPBs were able to demonstrate how they were reviewing their plans. We were particularly pleased that three RPBs told us they had commissioned an external review of their No Wrong Door plans. All RPBs are currently working on their population needs assessments, and again we were pleased to see children and young people's needs reflected in these, with some Boards

showcasing really welcome approaches to engagement with children and young people. These population needs assessments will help to shape RPBs' approaches in advance of the scheduled review of Area Plans in 2023.

Examples of positive progress in each region: February '22

Cardiff & Vale

In Cardiff & Vale of Glamorgan there are plans for a new 'safe space' open access model for children and young people in severe distress, to avoid the need for hospital admission. This new provision would provide a suitable child-friendly environment staffed by multi-disciplinary professionals, to respond to the needs of young people without them needing to waiting in A&E or be placed in an inappropriate setting. There will be a clear pathway set out for accessing this provision. There will be further discussion and planning to ensure this model is right and has all of the necessary connections to wrap around the young person and offer the right support at the right time from the right person. While this model is developing, there is temporary accommodation provision for under 18s on wards, until the new safe space is operational and embedded. Cardiff & Vale UHB will also be extending the operating hours of the Crisis Team to 24/7 by March 2022.

Cardiff & Vale have embedded mental health practitioners across school and early help teams in the region to improve their support offer. Cardiff social services is piloting a new CAMHS social worker post, with the role designed to build bridges between health and social care. There are also 'Thinking Together' conversations taking place as casework supervision, using a Team around the Worker approach and following an agreed Framework document.

Plans for new residential accommodation include short term assessment and support accommodation while either a return to the community or longer-term placements are organised. As part of this work, Cardiff and Vale of Glamorgan also plan to upskill the existing residential care workforce to provide more therapeutic support.

Cwm Taf Morgannwg

Cwm Taf Morgannwg have developed a CAMHS Single Point of Access gateway via telephone triage, which is for both professionals and parents. There is also an emotional wellbeing specialist parenting support service across the region which involves a community mental health worker providing direct advice to parents in each local authority area and social care teams. There are also CAMHS liaison workers embedded in Early Help Hubs as part of holistic assessment for families. In terms of responding to mental health crises, the CAMHS crisis team is extending its operating hours until midnight.

Cwm Taf Morgannwg have set out a 3 year plan for new regional residential accommodation for children with complex needs. This includes the development of an integrated residential placement hub in Bridgend, which is currently still at the construction stage, with a view to being operational from December 2022. This consists of seven beds (3 crisis intervention beds; 4 either short term assessment / medium term residential beds). There are also plans to develop a new regional transitional safe accommodation, which is still at the

exploratory stage, but it is hoped to be developed with an on-site therapeutic facility for 1-4 young people, with complex behavioural and emotional needs.

There is a new Whole School Approach Coordinator employed by the Health Board, who is currently developing a self-assessment tool to assess schools' abilities to meet the emotional wellbeing needs of children and young people. The new In-Reach (CAMHS) service is also recruiting 13+ mental health nurses & practitioners to work with Schools across Education across the region to develop a new service. This work is being taken forward using the NEST framework as a planning tool to guide the direction of operational service development.

Gwent

Gwent have continued the work of the Iceberg model, which is designed to bring together services to support children and young people's mental health and wellbeing needs. The Board themselves raised the need to be wary of complacency on this agenda when we met, and were able to demonstrate examples of how they are regularly reviewing the model, identifying gaps in provision, and addressing these gaps. This included the Single Point of Access for neurodevelopmental services now being accessible through the SPACE-Wellbeing panels; the commissioning of a feasibility study looking at provision of services for children with complex needs in areas of the region less well served (particularly in North Gwent); and the creation of a new cross-region coordination role aimed at improving the offer of SPACE-Wellbeing panels across Gwent.

Gwent are developing plans for new safe accommodation which includes four new beds for children and young people experiencing a mental health crisis. There are also plans for two one bedroom homes on the site to increase the wider residential provision in Gwent, which is designed for children who may 'fall between services'. It is due to be operational from early 2022.

The Emergency Liaison Team in Gwent offer a telephone service for professionals to discuss risk taking young people; and have extended their operating hours to 7 days per week, 8am — 7pm, with a CAMHS consultant available on call 24/7.

North Wales

One of North Wales' examples of taking a No Wrong Door approach is the Local Integrated Family Team (LIFT) project whereby Conwy and Denbighshire Local Authorities are working collaboratively with the Health Board to create a multi-agency and multi-disciplinary team aimed at intervening early with families where behavioural difficulties are emerging. It is designed to bridge the gap where universal interventions have been unsuccessful and where families do not meet the criteria for other services such as Specialist CAMHS. The service works with children and their families aged 0-18 years and consists of a Team Lead, Senior Clinical Psychologist, Occupational Therapist, Behaviour Nurse Specialist and four Navigators. They aim to offer a whole family approach to assessment, formulation and intervention understanding trauma and attachment, the impact of Adverse Childhood Events (ACEs), as well as neurodevelopmental and learning disabilities.

The region is participating in a national pilot for a children and young person care home education and support team, which aims to ensure accommodation providers caring for 'looked after children' have rapid access to specialist support from mental health professionals. A pilot project in Denbighshire aims to support the stabilisation of placements and prevent or reduce deterioration in a child or young person's emotional, behavioural or well-being state which may result in possible admission into CAMHS services or hospitals.

In **North Wales**, there are also plans for a new 'safe space' drop-in centre in Wrexham, for children aged 13-18 to receive support for an urgent mental health or emotional wellbeing issue. The centre will be led by CAMHS regional clinical lead, coordinated by health and Wrexham Local Authority. The project hopes to expand further to include third sector organisations. It will be open in the evenings, nights and weekends. The project aims to prevent or reduce deterioration in a young person's emotional, behavioural or wellbeing state which may otherwise result in an application of section 136 of the Mental Health Act ('being sectioned'), calls to emergency services, or admission into hospital or presentation at an emergently department. There will be a three-month trial in the coming months.

There are plans for new safe accommodation for children with complex needs across the region, including four new short term assessment beds, designed to provide a safe therapeutic place while a return to community services or a longer term placement is organised, and a crisis bed in the East of the region. Two new intensive support services have been established to work with children and young people with complex needs and their families who are on the edge of care. These services are intended to align with the new residential offer.

Powys

Powys shared with us the work of their Missing Middle project, which is an integrated team including professionals from CAMHS, youth services and sport. If a referral doesn't meet the CAMHS threshold, there is a youth intervention programme which will link with that young person and support them to get the help they need. In 2020-21, 125 young people had one-to-one support through this service. They also provide group work in schools including work to build resilience and exam stress workshops, and there are drop-in CAMHS consultations at all schools in Powys.

There are developments underway for a multi-agency panel providing early intervention for children across a range of services, although recruitment of a coordinator for that panel has not yet been successfully concluded. Powys County Council's Early Help Hub provides specialist parenting support for families of children and carers of young teams diagnosed with ASD / Autism.

Powys tell us they are working in partnership to explore the feasibility of developing safe accommodation for children with complex needs in County. We would encourage all relevant services to be full partners in this project.

One essential priority of their children and young people's work stream is a review of neurodevelopmental provision. A Project Board has been established and a revised pathway is to be piloted.

West Glamorgan

West Glamorgan shared their plans for a new adolescent unit as part of the Children's Emergency Unit at Morriston hospital, which would include CAMHS crisis team staff. They have also extended the operating hours of their CAMHS out of hours crisis team to midnight 7 days per week. They are currently looking into extending this offer to 24/7.

West Glamorgan have increased the CAMHS liaison role in their local authority Single Point of Access teams to support the local authority teams working with young people who have mental health needs.

West Glamorgan are planning a complex needs panel, whose role is to advise practitioners in the most complex cases at the 'higher end' of need, for example organising continuing care arrangements. This will be trialled using the real life experience of a young person from Swansea as an example. The Panel has recently met for the first time and set out Terms of Reference to improve outcomes for those with exceptionally complex needs with collective resources in social care, health and education. The Panel will meet monthly with a minimum of three attendees including one from health and one from the local authority to be quorate. The arrangements will be reviewed in six months' time.

West Glamorgan have recently been successful in a bid for Welsh Government funding for a project which aims to increase support for looked after children to prevent them reaching the need to enter residential care. Work is progressing to develop supportive fostering households, including exploration of an external provider for training and therapy.

West Wales

In West Wales the specialist CAMHS crisis response team is moving to 24/7 operation from January 2022.

There are plans for a regional multi-disciplinary service model which includes trauma informed interventions aimed at reducing challenging behaviours in children with complex needs and providing practical support for parents.

There are plans for a new region-wide complex needs advisory panel. The aim of this panel is that if individual local authorities are unable to find suitable placements for a young person meaning that the young person would have to be placed out of area, they will be referred to a regional panel where expertise is pooled to advise on next steps.

There are plans for new observation and assessment units in each county of the region, which will provide short term residential beds for children and young people, designed to prevent escalation to longer term residential placements.

Recommendation 2: Joint funding agreements, participation of children and young people, and integrated arrangements for transitions to adult services for children with learning disabilities

2.1 Joint funding

Regional Partnership Boards must ensure they are compliant with the newly amended Part 9 statutory guidance by:

Ensuring funding is not seen as 'held' by either the health board or the local authority, and that these arrangements are subject to a written agreement between partners. The funds should be owned by the whole region and all services should feel they have an equal stake.

Commentary on RPBs' progress

While there have been some examples of joint and pooled funding by regions, it is fair to say that in some regions this approach is not common. Some regions told us they had a long term formal written agreement on the joint use of funding. Some told us that the dedicated children's boards which sit under the RPB have oversight over decision making on the use funding which is relevant to delivering their priorities, and that those decisions are made jointly by the different services represented. Some Boards told us that decisions are subject to individual partner agreements. We suggest a more streamlined and longer term arrangement would improve efficiency and ultimately children and young people's experiences.

One Board demonstrated to us specific examples of projects where funds are pooled and a Memorandum of Understanding between partners on the basis that pooled funding would continue. However, this did not involve the local health board, just local authorities.

There are particular areas of work where joint funding arrangements with health and local authorities simply must be improved. This includes support for children with the most complex needs for whom continuing care arrangements are required.

2.2 Engagement, co-production and scrutiny with young people

In light of the new statutory requirement for section 12 duties to extend to Regional Partnership Boards, all Boards should review their current arrangements for engagement and coproduction with children and young people. RPBs should use the CCfW [The Right Way framework](#) for taking a children's rights approach to working with children and young people to guide their approach, alongside the [National Participation Standards](#). This must include the Board itself hearing directly from children and young people, and for children and young people to be empowered to shape the work of the Board.

Commentary on RPBs' progress

Some Boards told us about direct participation work the RPB had done with children and young people, which is very welcome. One Board has created a shadow board of young people which is outlined in the case study below. Others could demonstrate having undertaken engagement events and surveys, and reporting back how this has influenced their strategic direction and projects. One Board has uploaded information about their engagement activities as a toolkit on their website.

While many RPBs were able to demonstrate encouraging participation work going on within their region — through the health board or local authorities - not all were able to demonstrate how the Board *themselves* have involved children and young people in their work. As my recommendation sets out, Boards should be hearing directly from children and young people. Children and young people should have the opportunity to hold Boards to account. This is why we have shared resources for RPBs to support engagement work. We have based this on work that we trialled and undertook with young people, RPBs and the Deputy Minister for Mental Health and Well-being during the course of this project. We hope that Boards will find this helpful as a template to engage directly with children and young people in their region. We also recommend Cwm Taf Morgannwg's [toolkit](#) which is described in a later section of case study examples.

It was positive to note after our session with RPBs and young people, that some of the Boards asked to make direct contact with the young people from their region, to continue to conversation and explore further engagement opportunities and priorities.

Positive case examples of involving young people

Powys RPB have established a Junior Start Well Board, made up of young people aged 11-25, which has now met several times. The Board has its own terms of reference and nominated their own chair. The Chairs of the Start Well Board (adult sub-group of the main Board) attend every meeting, and there is a standing item on the Start Well Board agenda to update all Board members. The Board has discussed No Wrong Door and the Board have decided to set up a task and finish group as well as conducting a survey of young people (with 180 responses) about access to support for their emotional wellbeing.

In **Cwm Taf Morgannwg**, the RPB have developed their own engagement toolkit as part of the assessment of local wellbeing and need, with a section specifically on engaging with children and young people. This includes outlining a word association activity to engage children and young people on priorities for the region, before asking them to rank priorities and come up with a plan for how to deliver priorities using a 'who, what, why, how' matrix. We were pleased to see this toolkit uploaded to their website. The region were also able to share with us some innovative engagement activities including song-writing, a drama group, and writing a short book — all based around mental health and wellbeing.

North Wales shared evidence of participation of children and young people, including workshops for both children and young people, and professionals, in the summer of 2021, which looked specifically at responding to our No Wrong Door report. There is also welcome engagement with families where children

or young people are awaiting assessment for a neurodevelopmental condition, which is designed to help inform service delivery.

In **Gwent**, the RPB and Children and Family Board have worked on the development of a carer's story book 'It's Cool to Care!' made by young carers themselves through online forums during the lockdown period, and launched during Carers Week 2021.

2.3 Transitions to adult services

As part of their duty to support effective, integrated transition arrangements from children's to adult services, Regional Partnership Boards should publish multi-agency transition protocols, if they have not already, for children and young people with learning disabilities, considering how they deliver an approach so that the current multiple and pervasive issues of cross-local authority border and cross-sector disparities in transition arrangements are integrated as far as possible.

Commentary on RPBs' progress

Most regions were able to explain to us the plans they had in place for new regional transitions policies and protocols, which is welcome. One Board did not report any plans for a regional policy and protocol. Another is reviewing their current transitions protocol.

We didn't always find it easy to see how the protocols would make a real difference to families on the ground and we didn't feel this was adequately demonstrated to us other than in a small number of examples such as an online depository for advice and signposting for children with learning disabilities and their families. There is a real need for a truly regional approach to this in every region of Wales. The Welsh Government has just published [new transitions guidance for Health Boards](#), but this is unlikely to provide the multi-agency response needed by children with learning disabilities. We look forward to hearing more details on the transitions policies and protocols in each region.

Examples of positive progress

In **Cardiff and Vale of Glamorgan** there is a new transitions protocol for children and young people aged 14-25 with Additional Learning Needs called *Planning for My Future*. It is already being delivered across the region and will be formally launched in March 2022. Young people have been involved in the development of the protocol, to help shape the content and how it is presented to young people, including the design of the easy read version and a film co-produced with children and young people. The protocol is multi-agency and the partners involved are Education, Social Services, the Health Board and the third sector across the region. The protocol outlines how services involved in the young person's life will work collaboratively to enable a seamless transition for young people into adulthood. The region is also developing new 16+ accommodation in partnership with adult mental health services aimed at resolving transitions issues.

In **North Wales** they are developing a regional multi-agency transitions protocol for children with learning disabilities, in consultation with professionals. The Board will also be publishing a research report that has looked at the experiences of young people leaving specialist schools in North Wales, which has a number of recommendations for improving this experience. The Board has also piloted a holistic approach in Gwynedd (through ICF funding), which has an [online central platform](#) for accessing information about services in an accessible way. There is consideration of making this available across the region.

In **Powys** a transitions protocol for young people with Learning Disabilities is being developed, but it is in the early stages and was delayed by competing priorities during the Covid pandemic. There is now a monthly triage panel in Powys County Council to discuss arrangements for young people with Learning Disabilities moving to adult services.

In **West Glamorgan** there is a new overarching regional Transition Policy and Individual Patient Plan, which has been coproduced with young people. It is being piloted at the time of writing with the aim of rolling out across the region in 2022/23.

West Wales told us about progress in Carmarthenshire where there is a multi-agency 0-25 Learning Disability team in place. The local authority took a coproduction approach to how the service is run, through consultation with young people and parents / carers. When we met with the Board, members from other areas were keen to learn from this approach and undertaking conversations about setting up similar arrangements in their own areas.

Recommendation 3: working with T4CYP and accessible information

3.1 Regional Partnership Boards should work with the Together for Children and Young People Programme (2) to explore how they can better organise and publicise the role and work of the Regional Partnership Boards to make it more accessible to families. This should include accessible descriptions of multi-agency pathways for children with complex needs, as well as those projects which are of direct relevance to children and their families.

Commentary on RPBs' progress

We have been pleased with the efforts of some RPBs in making their work more accessible via their online platforms. Some of these include having videos and written case studies demonstrating individual stories, and what those individuals would like to see improved. One Board's website showcased their engagement approach through a toolkit published on their website.

However, we are disappointed that some RPBs' websites are still not user friendly, and don't regularly update minutes from their meetings for example. This is disappointing as this was highlighted in my June 2020 report. Particularly in light of the Covid pandemic, there is a growing expectation for quality information to be readily available on public services' websites.

In terms of the services available to children and young people, there has been some progress by local health boards to better advertise CAMHS services during the pandemic and, where multi agency pathways are established, some information about their services is available online. However, it remains the case that this information is not easily available in every region of Wales, despite regular reminders and requests from my office.

We are pleased to report all Boards have engaged with T4CYP and the NEST / NYTH framework, although one region noted that they were waiting for a funding injection before advancing plans to embed the Framework in their work. As we set out elsewhere, there is a real need to support RPBs to implement the NEST / NYTH framework, and for them to be held to account in their ongoing delivery of it. The six-month extension of the T4CYP programme to support this is welcome; it is unclear as yet what this programme of work will consist of and whether this is sufficient time to get all the Boards to fully embed and deliver the framework.

Examples of positive progress

Cwm Taf Morgannwg RPB's new [website](#) is user friendly, including films, case studies and a clear explanation of the population needs assessment process through the '100 days of engagement' framework. The case studies give individual stories including what those individuals would like to see improved in their region. It provides information to explain the work the RPB is doing in an accessible way, and shares a toolkit on engaging with citizens in their region, including specifically with children and young people. It also includes contact details for the region's Community Action Engagement Group, which is gathering views for the assessment of wellbeing and need.

Cardiff & Vale of Glamorgan Health Board has launched a new Emotional Wellbeing and Mental Health website, with dedicated sections for children, young people, parents and carers, and professionals. The website makes resources available for children and young people to support their emotional health and wellbeing more accessible online. This includes animated videos coproduced with the Health Board's Youth Board. The website also provides guidance and advice on which services are available such as the Single Point of Access service.

In **Gwent**, information about the SPACE-Wellbeing multi agency panels is available online, including a [web page](#) which gives families the contact details of each panel so that they can self-refer, as well as information for other professionals. This includes descriptions of what to expect from the SPACE-Wellbeing panel.

In **West Glamorgan** the health board have recently launched a [website](#) offering advice and support for children and young people with mental health and wellbeing called *Tidy Minds*. It provides advice and signposting for children and young people, as well as advice and support for parents and carers. This website was coproduced with children and young people.

3.2 Regional Partnership Boards should work with citizen and third sector representatives who work with children and young people with complex needs to make sure they are sufficiently involved in meaningful work as part of the Board, and feel fully valued as equal partners by the statutory members on it.

Commentary on RPBs' progress

We did not feel that any Board was able to give us a truly satisfactory response to this recommendation. Certainly, some Boards appear to be better than others with third sector involvement, and third sector partners appear to play a strong role in several of the Boards. However, we have continued to hear from third sector representatives that statutory services dominate the conversations and that they are not always valued as equal partners.

While several of the Boards were able to demonstrate third sector involvement in their meetings, and delivery of services in partnership with the third sector, we saw little evidence that Boards were actively reviewing the role of third sector partners to ensure they are embedded in decision making.

Just one of the RPBs visits included contributions from citizen representatives during the meeting with Sally — **West Glamorgan**. We were pleased to see that two service user representatives raised points within the meeting we attended, and indeed we also saw those representatives make suggestions in emails, including alerting the Board to the work of another RPB giving information on their population needs assessment on their website.

We are pleased to hear that Welsh Government have established a new task and finish group considering the membership of RPBs and the position and contributions of third sector, citizen and carer representatives. We understand that the statutory guidance may be amended in relation to the membership of Boards. We would welcome such a move to ensure the active and meaningful involvement of third sector, citizen and carer representatives.

Examples of positive progress

West Glamorgan were the only Board we met with where citizen representatives were active contributors to the meeting. Involvement of citizen representatives in our meetings with the RPB, including making contributions to the discussion, and following up with emails sharing good practice from other regions.

Cardiff and Vale of Glamorgan are developing a participation framework, with the third sector supporting delivery of this in partnership with the RPB. There is a plan to make significant investment in this work, which will go out to tender bids. The work will link in to existing fora and take a co-production approach. As well as representation on the RPB and Starting Well Partnership, the delivery groups for Emotional Health and Wellbeing and Disability have operational third sector representatives and a stakeholder group for wider engagement across the workstreams.

In **Gwent** the ICF team and Performance Management Office that support the RPB have worked closely with third sector umbrella colleagues (GAVO and TVA) to ensure partners are embedded in the planning and decision making of areas concerning children with complex needs. Voluntary sector organisations have helped plan the allocation of ICF funding in line with WG recommendations. Sparkle voluntary organisation is also involved in the strategic regional subgroup on children with complex needs.

3.3 Regional Partnership Boards should develop a memorandum of understanding with Public Services Boards on potential cross-over issues where these related to children and young people, which includes an agreement on how to approach those issues which would benefit from joint working between Regional Partnership Boards and Public Service Boards, such as having arrangements in place for funding applications or joint commissioning.

Commentary on RPBs' progress

RPBs were able to tell us that they had met with their PSB or PSBs, and several had agreed a Memorandum of Understanding or way forward ensuring they engage on issues where there is crossover. Those that had not developed a Memorandum of Understanding were in the process of considering their approach to work more closely with the PSB. Most RPBS told us they were working closely with the PSB or PSBs in their region on their population needs assessments, market stability reports, and well-being assessments.

Examples of positive progress

Gwent has a Wellbeing Assessment Group which combines members of the RPB and PSB and have worked together on developing a joint population needs assessment and wellbeing assessment. The region is developing a regional PSB in order to link up issues of overlap. Gwent RPB continue to meet with the five PSB Chairs in the region to discuss common challenges and responding in partnership.

Annex 2: Welsh Government's response to our 2020 recommendations

1. As the responsible body for the administration of funding for Regional Partnership Boards, Welsh Government need to demonstrate leadership by clarifying their responsibility for the framework within which Regional Partnership Boards operate. Welsh Government should ensure that robust accountability mechanisms are in place for Regional Partnership Boards to report on their work on multi-agency arrangements for children with complex needs, including transitions to adult services. This should include proactively reviewing Regional Partnership Boards' Area Plans and monitoring progress against their ambitions through Annual Reports and meetings.
2. Welsh Government will need to support Regional Partnership Boards with their long term strategies. This support will be needed more than ever because of the current circumstances, and should make clear how Welsh Government will make funding available to achieve better experiences and outcomes for children and their families. This should include system change that will help families experience a 'no wrong door' approach in every region such as integrated teams, panel and hub models to provide timely joined-up help, drop in centres and plans for integrated residential provision where needed.

Commentary on Welsh Government's progress

We welcome changes made to the [Social Services and Well-being \(Wales\) Act 2014 Part 9 Guidance](#) in 2020. We have seen the impact of these changes in the work of RPBs, including the setting up of children's sub-groups in every Board, and a clearer definition of 'children with complex needs'. We also welcome the changes to population needs assessment guidance which brings a focus to children and young people.

We acknowledge Welsh Government have made significant funding available specifically for some of the aims included in our No Wrong Door recommendations, most notably for new safe accommodation for children with complex needs. They have also set out their expectations for a focus on integrating children and young people's services in ICF guidance and the population needs assessment guidance.

Welsh Government have also demonstrated their commitment to this agenda by scrutinising the work of the Boards on integrating services through regular meetings with them.

We have been pleased to see:

- Welsh Government's engagement with the RPBs, including regular meetings by the Deputy Ministers, and the organisation of shared learning events. The Commissioner's office was pleased to be able to present at one of these shared learning events, which focused on participation and engagement of children and young people in Population Needs Assessments and Market Stability Reports.
- The amendments which have been made to the [Populations Needs Assessments supplementary guidance for RPBs](#). There is a clearer focus on children and young people, and we are particularly pleased to see the way in which RPBs have picked up on this.
- Funding — we are aware that Welsh government is considering longer term funding which brings together ICF and transformation funding, which will be in part to support the implementation of NEST / NYTH. We are pleased to see this response to our previous comments on the short termism of funding, and know that RPBs would welcome such a commitment to longer term funding. Their December 2021 response to us says "Children with complex needs will also continue to be a focus for the new Fund to replace the Integrated Care Fund and Transformation Fund" but at the time of writing in February 2022 the full details of this have not yet been published.
- The [Rebalancing Care and Support White Paper](#) promises a strengthening of regional partnership arrangements in relation to governance and scrutiny, planning and
 - performance, engagement and voice, integrated service delivery, and rebalancing the social care market.
- An extension to the work of the T4CYP programme to September 2022, specifically to support:
 - **"Working with Regional Partnership Boards**, to continue supporting RPBs with NEST implementation and liaison with CoP arrangements prior to handover to the WG Nest implementation lead when recruited; and
 - **Neurodevelopmental Services**, to allow time for consideration of the D&C review with a view of developing future improvement and support activity in this area."

What we need to see now:

- The robust accountability mechanism we have called for is not yet in place. It is absolutely paramount for embedding and delivering the NEST / NYTH framework as a region. The six month extension of the T4CYP programme is welcome but what is needed is a longer term approach to ensure the success of this important framework.
- The proposals resulting from the White Paper on Rebalancing Care need to be strengthened in respect of RPBs' role and operations, including pooled funding arrangements. We note that in their December 2021 response to us, the Welsh Government "have not ruled out extending the Regulations", but there does not appear to be an appetite to do this at present. We would advocate based on the work of our two reports that this is necessary in order to secure and embed quality, multi-agency provision in each region for children and their families.

- The delivery of a long term funding mechanism which allows RPBs to plan ahead for multiple years in order to embed a No Wrong Door approach through the NEST / NYTH framework.

The Government's December 2021 response refers to RPBs' annual reports as "an opportunity to demonstrate to a wider audience the work RPBs have achieved over the past year." But as we've already noted, RPB websites are not all particularly accessible and these reports vary greatly in length and accessibility. We'd expect more to be done to inform and engage citizens including children about the work and remit of the RPB.

3. **Welsh Government should amend the Partnership Arrangements and Population Assessments Regulations to require pooled funding for a 'no wrong door' approach for children and young people.**

Commentary on Welsh Government's progress

In the update we received from the Deputy Minister in October 2020, we were told that it would not be possible to amend regulations before the end of the Senedd term. We now urge Welsh Government to make those amendments. In the December 2021 update the Government says "our focus at present is on developing regional approaches to residential care for children with complex needs, and encouraging the regional partners to develop more innovative models of delivery such as micro-care and an expanded social value sector." It is unlikely that new safe accommodation for complex needs can truly be jointly commissioned and delivered without the pooling of funds and resources.

A particular example of where pooled or shared funding arrangements are not successfully being deployed is in Continuing Care arrangements. This is because joint working is mandated by the Continuing Care guidance but the pooling of funds is optional. It is clearer than ever to us that this must be an area where pooled or shared funding arrangements should be mandated. The current guidance encourages pooled funding but does not make it mandatory. It is clear from the regular casework that we receive, as well as representations from senior professionals in health boards and local authorities, that the current arrangements are not working for families.

In their December 2021 response to us, Welsh Government reiterated that they "have decided against establishing the Regional Partnership Boards (RPBs) as legal corporate entities at this time". There does not appear to be an alternative coming forward however in addressing the issues we've been raising such as funding arrangements. The Government plans to 'increase opportunities' for pooled budgets but opportunities already exist and aren't being taken up.

The response quotes the KPMG report from June 2020 on residential arrangements for over 65s. That report found that five RPBs do not physically pool their funds, they just have shared reporting mechanisms. Some but not all regions have a pooled funding manager in place. The report notes that the Welsh Government *expected* physically pooled budgets when the legislation was created and yet this isn't being followed up with RPBs strongly. The report also recognises some potential benefits to pooled funds, for example to have regional data to drive strategic decisions, and to enable proper joint commissioning. These are, by their

very nature, core components of a No Wrong Door approach, and prerequisites for provision such as Continuing Care and Regional Safe Accommodation to be taken forward properly on a multi agency basis.

- 4. The current Welsh Government review of 'safe accommodation' must lead to concrete action being taken to develop new residential provision in Wales for children with complex needs upon reporting.*

Commentary on Welsh Government's progress

We have been encouraged by Welsh Government's response to this recommendation. We have been particularly pleased with Welsh Government's £2 million of funding made available for RPBs specifically to develop new safe accommodation for children with complex needs and the [specific ICF guidance](#) accompanying it.

Most RPBs have responded with plans for new safe accommodation, and most of these have input from both health and social care, including therapeutic support. Some also include third sector involvement. None of the provisions have yet opened however or have a scheduled timeline to open. Disagreements continue in some areas as to who should be involved and what the model should be, in the absence of a national model from the Government.

As we outlined earlier in this response, we are concerned that while these new beds are very welcome, there remain serious issues with disputes between agencies on arranging placements for children and young people with complex needs. These new plans will provide a vital service and help to prevent children unnecessarily being placed in tier 4 CAMHS provision, secure accommodation outside Wales, or inappropriately placed in hospital. However, it is clear to us that far more needs to be done to ensure services are brought together to organise suitable placements for children with those most complex needs, and that the agencies involved — in all regions - do not have a functioning inter-agency process for organising those placements for children with the most complex needs.

- 5. Welsh Government and the Together for Children and Young People Programme (2) should work with their partners and with Regional Partnership Boards to organise further shared learning events to focus specifically on a 'no wrong door' approach for children and young people with complex needs.*

These shared learning events should include discussions of barriers between services' use of language (particularly but not confined to health, social care and education) around children with complex needs, in order to promote the new broader definition under the revised Part 9 statutory guidance, as well as being guided by the National Commissioning Board Wales' definition. The events should also include discussions of the issue of how information is shared and resources are pooled, and whether the current information sharing system needs improvement.

Commentary on Welsh Government's progress

We are pleased to report that Welsh Government have been working with T4CYP, and have organised four shared learning events with all the RPBs. This included an online session with all RPBs on participation and engagement for their population needs assessments and market stability reports. Our office was pleased to be able to present at this event on taking a children's rights approach to engaging with children and young people to influence strategic plans. T4CYP have also been proactively engaged with the RPBs and Welsh Government in developing the NEST / NYTH Framework.

As outlined earlier, though, we heard quite often from Boards who were unaware of innovative work happening in another region. We would hope that these shared learning events would mean Board were more aware of work outside their region, but it is clear that more must be done to share practice.

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