

## **Flintshire County Council response to the Report to the Auditor General for Wales Report “Direct Payments for Adult Social Care**

This report has been eagerly anticipated and we thank you for undertaking this important research. The report shines a spotlight on direct payments and we are supportive of any focus that promotes increased choice and control, and improved outcomes for citizens.

Flintshire County Council has invested in developing and nurturing a social care culture of choice and control where we aim to empower people to self-determine their lives and exercise their rights in line with the Social Services and Well-being (Wales) Act 2014. In this respect we consider direct payments to be integral to this vision.

Direct payments are fundamental to the delivery of a diverse range of social care solutions and in recent years we have invested in developing a range of specialist services and resources that improve information, accessibility, advice and support to people choosing to use direct payments to arrange their bespoke solutions, satisfy their requirement and achieve their personal outcomes.

### **Summary Report**

We agree that improved consistency in practice, approach and service user experience can only benefit the understanding and opportunities presented by direct payments. We welcome the inclusion of the characteristics of a local authority who effectively encourages, manages and supports people to achieve their assessed needs and outcomes via direct payments. However, we feel that this section could have been expanded upon and contextualized with a range of best practice examples from Flintshire and other Welsh Local Authorities. The report could then be used by authorities wanting to develop and improve. As it reads currently, there are few good practice examples and a focus on improvements that have been achieved from a low base level.

Whilst we recognize that there are inconsistencies of promotion, implementation, support, monitoring and review of direct payments across Wales, we are also proud of the progress we are making locally and feel that an opportunity has been missed in not including reference to specific innovations and best practice examples. We are of the opinion that this report represented a real opportunity to showcase and incentivize a wide range of creative initiatives. This could have enabled opportunities for shared learning and promoted a collective view of what good could look like, potentially helping to achieve the type of consistent approaches that are currently felt to be lacking. We feel that opportunities have been missed across the scope of this research to both showcase, and celebrate the innovative and unique approaches being explored, designed and delivered in Flintshire and across Wales.

## **Key Messages**

Direct payments are a means to an end. They enable individuals and their families who choose to have greater choice and control the opportunity to work in genuine partnership to design and implement bespoke arrangements aligned to their personal priorities, lifestyle and circumstances. Direct payments are therefore fundamental to achieving the aspirations of the 2014 Act and specifically the responsibilities outlined within the Part 4 Code of Practice. The real value of direct payments can therefore only be measured by the impact of the funding and the difference made on an individual, family, or community level. We do not feel that the report accurately reflects this perspective, or demonstrates an understanding of the broader impacts of direct payments on citizens, or the local authority.

## **Recommendations**

We recognize the importance of timely accessible information. The Flintshire Direct Payments Support Service has coproduced, with citizens a range of information booklets, factsheets and other resources to help broader understanding of direct payments. We also recognize that regardless of the quality of written information it is often necessary to adopt flexible and bespoke approaches to enabling full understanding of the opportunities and responsibilities and have tried to facilitate an approach that recognizes this. We broadly agree that promotion of direct payments as a genuine option for people ties in with social work practice, social work understanding, team culture, Social Work training and leadership. To give context to these recommendations we feel that providing examples of good quality resources such as available information, training approaches etc., details of what is currently available and what is missing in Wales would have been helpful and constructive in supporting progress in these areas.

With regards to Recommendation 3, we are slightly confused that the report suggests that independent advice about direct payments should be provided from first contact. This appears to be contradictory to the report's findings detailed in exhibit 3 and paragraph 2.11 that citizens receiving support from direct payments services provided by local authorities have a more positive overall experience than those using a commissioned service. The report's findings also suggest that 96% of direct payments recipients received initial information from local authority practitioners.

**Direct Payments & CHC Funding** – We welcome the Welsh Labor Governments Manifesto pledge to improve the interface between direct payments and CHC. We are currently involved in moving this agenda forward via stakeholder and focus groups. However, we are of the opinion that to enable people in receipt of CHC funding to benefit from the same rights to exercise choice and control over their arrangements as other direct payments recipients will require changes to primary legislation.

**Systems to evaluate Direct Payments** – The Flintshire Direct Payments Support Service have developed core data sets and are using intelligent information to inform

future priorities and practice. We are striving to align such data with the known impacts of direct payments solutions to provide a 360 degree evaluation process. We have also embedded citizen feedback into our work and are using this to shape and confirm the effectiveness of our services. Inclusion of such examples within the report and/or proactive suggestions to help local authorities build more robust systems would have been welcomed.

**Recruitment & Retention** – Personal Assistants are employed directly by recipients who are empowered and supported to become good employers, meet their responsibilities and retain workers. We cannot see how a joint recruitment and retention plan could be adopted and implemented without undermining the autonomy enjoyed by direct payments employers. We would rather focus on providing high quality support services that helps direct payments recipients become high quality employers.

**Clarify Policy Expectations** – We believe that the SSWB (Wales) Act 2014 and Part 4 Code of Practice provides the information, guidance and framework to enable local authorities to deliver on this recommendation.

We would also be concerned that a recommendation suggesting that what direct payments can pay for are defined could stifle innovation and lead to a more prescribed process focused approach.

There are already light touch, user friendly systems in place within Wales to reduce bureaucracy, paperwork and manual auditing enabling people to focus on what matters to them. Examples of good systems would have helped demonstrate the options.

Unused Funding – In Flintshire we promote the flexible use of direct payments, enabling people to change the way they meet their needs and outcomes and adapt to changing circumstances. However, where funding is no longer needed to meet assessed needs and outcomes we strive to work in partnership with individuals to reuse money that is no longer needed. Funding is returned to the local authority to be used with other people. We do, however disregard the equivalent of eight weeks funding to support the flexibility inherent within the scheme.

### **Personal Assistants**

We acknowledge that Personal Assistants are an important source of support for many people, and often enable a very personal, flexible relationship which has major benefits. The Flintshire Direct Payments Support Service has designed, developed internally and implemented some highly innovative resources that support and recognize the roles that Personal Assistants play locally. These innovations are the first of their kind in Wales and we were disappointed that they were not referenced within the report. Such approaches are often the catalyst for discussion, challenge and improvement and in this regard we feel that the decision not to reference this and other work being undertaken across Wales was another missed opportunity.

We don't fully agree with the statement ***“Personal Assistants are essential to people making the most of Direct Payments, but service users struggle to recruit them”***. As stated Personal Assistants can be the best solution for many people, particularly those in need of physical care and support, however we feel that this emphasis on Personal Assistants is unhelpful and demonstrates a very limited perspective. Certainly the focus of direct payments in Flintshire is on helping people achieve their personal outcomes, so solutions should not be limited. Further to this we could have provided a range of creative examples.

### **Good Quality and accessible Information**

We welcome the finding that the vast majority of recipients involved in your survey found out about direct payments from a local authority officer. We were also encouraged that all local authorities are striving to provide quality information about direct payments. From a Flintshire perspective the team have worked with citizens and I.T partners to completely reinvent our web based resources. This has resulted in an 800% increase in activity over the past 12 months. Additionally we have facilitated forums, publish a quarterly newsletter, have an on-line news page, have developed Facebook and Twitter feeds, have written direct payments related articles, produced high quality promotional videos accessible via the Flintshire YouTube channel, addressed elected members, developed a catalogue of examples of innovative use of direct payments and have supported innovative solutions particularly during the pandemic to help people resolve personal challenges. We strongly feel that sharing such practice would have helped balance the report and supported other local authorities to develop their resources and approaches.

### **Average spend per Direct Payment recipient**

We don't understand fully the value of this comparison. Is the report suggesting some correlation between direct payments funding per person and needs met, or outcomes achieved? If so, it would be helpful to have included examples to better explain. From our experience some of the lowest cost, innovative solutions can enable the achievement of individual outcomes who's benefit is hugely disproportionate to the financial cost.