

CONSULTATION RESPONSE FORM

We are consulting on new statutory guidance which is intended to simplify local service planning, simplify partnership working, and strengthen the strategic role and accountability of the local service board (LSB).

The Guidance is intended to replace existing statutory guidance deriving from a number of pieces of legislation: Community Strategies (Local Government (Wales) Measure 2009), Children and Young People's Plans (Children Act 2004, Children and Families Measure 2010), and Health Social Care and Well-being Strategies (NHS Wales Act 2006). Community Safety planning is non-devolved (Crime and Disorder Act 1998) so the guidance is advisory.

How to respond

Please submit your comments using the online response form or e-mail them to LSBCONSULTATION@wales.gsi.gov.uk

Press 'Tab' to move through fields

Consultation Response Form

Your name: Flintshire Local Service Board

Organisation (if applicable):

email/telephone number:

Your address: Flintshire County Council
County Hall
Mold
CH7 6NB

1. Does this guidance make clear what is expected and does it provide a sufficiently robust framework for LSB partners to work within?

Comment:

- Flintshire Local Service Board (LSB) welcomes the publication of the draft statutory guidance 'Shared Purpose - Shared Delivery' and the flexibility provided to LSB's in exercising their statutory responsibilities as required by existing legislation.
- Although the guidance is clear in its expectations of LSB's in undertaking integrated planning, it is not too prescriptive in its approach allowing many factors to be determined locally at the discretion of partners. This is crucial given that LSB's work in different ways across Wales.
- The role of the LSB is to lead on local priorities in response to local need based on robust evidence and needs assessment. It is acknowledged that Single Integrated

Plans will inevitably contribute towards the delivery of the Welsh Government's (WG) Programme for Government, however it is not the purpose of the LSB to deliver the Programme for Government priorities. LSB's are not delivery agents for the Welsh Government.

2. Are there any parts of the guidance that require clarification?

Comment:

- The guidance states that the Welsh Government will consider each single integrated plan and provide feedback. Welsh Government should provide the specific criteria on which the plans will be considered across Wales and the basis upon which any judgements will be made. This should also provide for the identification and sharing of best practice/models. Additionally, clarity on the framework to be used for the inspections/reviews referred to in the consultation should also be provided. This should include clear criteria upon which judgements as to robustness of single plans, for example, will be determined.
- It is important that the new statutory guidance is clearly communicated to the regulators to ensure that the changing partnership landscape is understood.
- Greater clarity is required on the requirement for annual reporting as the Consultation does not provide clarity on what is required or how the information will be used.
- In the section on scrutiny, reference is made to the Local Government (Wales) Measure 2011 which gives new powers to local authority scrutiny committees to scrutinise other public service providers in their area in addition to Council services. The Measure also contains provision for setting up joint scrutiny committees with other Councils. It is difficult to fully respond to proposals regarding scrutiny of partnerships as contained in consultation document until further guidance is issued on the Measure.
- As local authorities and its partners develop new sub regional and/or regional collaborative arrangements, there will need to be clarity about the scope, extent and structure of scrutiny arrangements and how these fit with local arrangements.
- If the future arrangements put in place to replace the Outcome Agreement mean that the grant is linked to the Single Integrated Plan, a guarantee would be sought from the Welsh Government that the grant would continue to be provided to the Local Authority and that the Local Authority would not be penalised by non-delivery of partners.
- It is not clear whether there will be an expectation for Local Authorities to identify a Lead Director and Elected Member for Health, Social Care and Well-being and Children and Young People.
- Some confusion is caused by the use of language which is not always consistent with the wider policy agenda. In particular, the guidance refers to "neighbourhoods" without clarifying what that means. A greater level of planning is now moving into

localities and it is important that there is a consistency of approach in order to avoid the creation of additional “layers” or further fragmentation which, in turn may affect current work to rationalise the planning structures used across the partnership.

- The guidance refers to the role of Local Safeguarding Children Boards (LSCB’s) and includes reference to the changes which lie ahead in the form of the expected Social Services (Wales) Bill. The guidance needs to include further clarification on the role of the LSB and the LSCB in relation to responsibility, communication and reporting and scrutiny on matters that concern child protection and safeguarding. Whilst it is acknowledged that this may be difficult to establish given the awaited Social Services (Wales) Bill and the potential changes it will bring for LSCB's it is crucial that the roles and responsibilities of the LSB and the LSCB in relation to monitoring the effectiveness of work that is undertaken to protect and safeguard children and holding agencies to account for their work are clearly set out within this guidance or within the Social Services (Wales) Bill itself. This is of particular importance given the possibility that LSCB's will become regional bodies in the future rather than local adding further emphasis to the requirement for clear roles and responsibilities in respect of these two bodies.

3. Is there anything that is impractical or should be modified or deleted from the guidance?

Comment:

- The guidance outlines that ‘the role of the LSB is to lead change’ Whilst we agree with this, it is important to clarify that the LSB should only be considering issues which require involvement due to the scale or potential impact . It is important that the LSB retain its focus on:
 - Effective and trusting partnership relationships as a set of local leaders.
 - Discharging the responsibilities of the LSB - this includes producing a meaningful and fit for purpose Single Integrated Plan.
 - Consistent and effective governance and performance of strategic partnerships.
 - Identifying common issues as public bodies/employers.
 - Promoting collaboration in the design and provision of local public services to make best economic use of local partner’s resources, such as people, money, assets and technology.

At the local level, senior managers and identified responsible officers should remain accountable for resolving many of the issues as part of ‘business as usual’.

We also acknowledge that there will remain the need for local, sub-regional or regional specialists / professionals to inform the decision making process and to take decisions.

- In addition, as strategic partnership working arrangements develop some decisions will be made at a sub-regional or regional level. For example, the Community Safety Partnership would link into the LSB and participating in all activities such as joint needs assessments, consultation, etc, but the strategic decisions would be taken at a regional level (informed by local dynamics).

- A key concern relates to the timescale proposed within the guidance for publication of a single plan. To meet the requirement for a 12 week consultation period, it would be necessary for a draft plan to be published for consultation by October 2012. Critical challenges exist for local authorities as a key member of LSB's in meeting this deadline including:
 - Any impact resulting from the Local Elections.
 - Being in a transition period for Communities First until September 2012.

It is essential that sufficient time is given to undertaking a robust needs assessment which is different to creating a profile of the population and far more demanding in terms of data analysis and engagement within the public. A performance management framework will also need to be developed as part of the plan.

It is therefore proposed that the 2013 implementation date is inappropriate. An implementation date of 2014 would be in line with the current life of recently 'signed off' partnership strategies.

- Our Partnership Framework in Flintshire and across North Wales has been reviewed and rationalised. Most of our partnerships work well and are a key vehicle for engagement and endorsement. There is some concern therefore of the need to reduce partnerships when there may not actually be a need to do so. For example, one of the measures in the Programme for Government to review progress relate to the number of local authorities that rationalise their partnership structures.
- It may be particularly challenging to pinpoint the extent to which the specific actions of the LSB contribute to population and performance outcomes – given that these are affected by numerous factors.

4. Is anything not covered in the guidance that you think should be?

Comment:

- A view on how Single Integrated Plans will be used to inform Welsh Government policy and strategy would be helpful.
- A success measures stated in the guidance relates to 'the number of statutory plans required by the WG from public service partners and produced by 2014'. Further guidance on the strategies required by Welsh Government and a view on further rationalisation would be helpful.
- The guidance does not refer to expectations that are currently placed on partnerships which currently fall under the HSCWB agenda including:
 - Creating an Active Wales
 - Talk to Me
 - Families First
- It would be helpful to highlight the range of national plans and policies which would also need to be fully taken into account in the development of the single plan where

it is likely that these will previously have been overseen by existing partnerships.

- The relationship, role and responsibilities of the LSB and the LSCB in relation to monitoring the effectiveness of work undertaken to protect and safeguard children and young people.
- No mention of regeneration and little of the economy as a whole. The integrated plans should be looking at how they can link to these agendas – the needs of the people being served are hugely influenced by the economy and their place in it and the integrated plan has a key role to play in helping people to improve their economic situation.

5. Are there any policy issues in the guidance that you disagree with?

Comment:

- The guidance refers to the need for 'LSB's to submit their plans to the Welsh Government for comment and feedback'. Plans should not be subject to approval by Welsh Government as the Plans are owned and managed by the LSB's as the local accountable body.
- The consultation refers to a Joint Assessment Framework. This may cause confusion as a joint assessment framework is a term used to assess the needs of an individual child, young person and their family. In the document it is referred to as the format for the needs assessment for the integrated plan.

6. Do you think putting LSB's on a statutory footing would help to deliver the policy objectives?

Comment:

- Flintshire LSB does not believe that by putting LSB's on a statutory footing this would help to deliver policy objectives. It is felt that this is not the significant factor in making a difference – there is already a strong and increasing imperative to work in partnership. The need for strong leadership is the most critical factor.
- Many of the existing partnership arrangements have been based on a statutory requirement. It is our view that the successes of our partnerships are based on effective working relationships and not an enforced requirement to work together.
- Regardless, Welsh Government must emphasise the importance of LSB's in public service reform and encourage all partners to engage as appropriate. To enable this to happen more effectively, Welsh Government should ensure that strategic planning cycles, commissioning and performance management are aligned.

7. Do you have any other comments or questions?

Comment:

- The consultation refers to the benefits of an '*outcome based approach including a shift in focus from process and outputs to impact on wellbeing*'. Evidencing a partnerships impact on outcomes is a challenging area of work for all partnerships, as detailed in the recent review of LSCB's in Wales.
- The guidance suggests that LSB's '*invest time in developing thorough evaluation frameworks....*' Has consideration been given to developing a national evaluation framework to support LSB's to assess their effectiveness? (e.g. LSCB SAIT tool).
- It is reassuring to see the inclusion of a specific section for children and young people in chapter 5 – 'Principles of integrated planning'. In particular, that the single plan should build on the work undertaken to date in ensuring that the needs of children and young people are recognised and the appropriate services provided. The fact that the guidance states that the single plan should maintain a strong focus on outcomes for all children and young people is particularly important given that children's issues can often be subsumed within the adult agenda. It will be an expectation that each LSB single plan will be equality impact assessed – has consideration been given to a specific Child Impact Assessment – used in some areas across England to identify the impact of decision making, policy making and planning on children and young people.

Responses to consultations may be made public - on the internet or in a report. If you would prefer your response to be kept confidential, please tick here: