

## Consultation Response Form

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### Consultation Questions

**Question 1: Do you agree that changing the health board boundary would strengthen partnership working arrangements for Bridgend County Borough Council, local authorities and other partners across both the Cardiff Capital Region and the Swansea Bay area?**

Yes/No

Yes

Please comment here:

Bridgend Council operates on two strategic and overlapping footprints. The choice of these footprints is dictated in part by the boundaries of the Health Board and in part by patterns of economic activity or historic alignment. In simplistic terms these equate to an East facing and a West facing footprint as follows:

#### East Facing

- Bridgend is a partner within the Cardiff Capital region City Deal. Though equidistant between Cardiff and Swansea, Bridgend's economy is dominated by the effect of Cardiff. This is evident through transport (such as net travel to work migration), the housing market and economic activity. In addition the Council has historic links with this regional footprint that has led to historic collaborative approaches in matters such as highways and transport. Through the City Deal, the Council has committed to regionalising a number of services including Strategic land use and transport planning.
- Bridgend is a member of the Central South School improvement consortium that also includes RCT, Merthyr, Cardiff and the Vale of Glamorgan. This partnership is well established and serves the Western half of the Cardiff Capital Region.
- Bridgend provides Regulatory Services (Environmental Health, Trading Standards and Licencing) through a shared service with Cardiff and the Vale of Glamorgan.

## West Facing

- Bridgend CBC is well advanced with Social Care and Health integration with the ABMU Health Board and delivers many aspects of Social Care in partnership with Neath and Port Talbot and Swansea Councils (the three councils collectively being coterminous with ABMU). Bridgend has entered into a regional section 33 agreement for community services with ABMU.
- Bridgend CBC has a long standing Section 33 Agreement in place with ABMU for the delivery of day opportunities for people with mental health needs.
- Bridgend CBC leads a regional Youth Offending Service that covers the three councils in the Western Bay footprint.
- Bridgend CBC leads an integrated Family Support Service that covers the three councils in the Western Bay footprint.
- Bridgend CBC is part of the Western Bay Regional Adoption Service.
- Bridgend CBC is part of the two Western Bay Regional Safeguarding Boards.
- Bridgend has a shared legal services with other South West Wales Councils.

## Strategic considerations

Whilst there are many services where Bridgend currently collaborates, the most important in terms of scale, value, impact and interrelationships are:

- Education (Central South Consortium)
- Social Care and Health (Western Bay Partnership)
- Regional Economic and Spatial development (Cardiff Capital Region City Deal)

These three partnerships are not aligned to each other as described above. This gives rise to the following problems:

- Reduced resilience and capacity to lead and develop services for the benefit of residents. Each of these partnerships require significant political and managerial leadership capacity to maintain and influence. The White Paper envisages regional governance structures to support and streamline regional working. However, because these are in different “regions”, the Council would have to try and maintain sufficient capacity to contribute in both regions. This is already a concern for Bridgend and with reducing resources (such as a shrinking management team) this is not sustainable. Without resolution of this conflict the changes proposed by the White Paper would not resolve this and, given the proposed regional governance arrangements set out, would be highly likely to increase the resource needed to ensure appropriate governance is in place. These impacts are likely to be mirrored in other organisations that work in partnership in Bridgend for example, other public sector bodies and the third sector.
- Missed opportunities for service alignment. We need to better align education and social care collaboration. For example, the White Paper itself points to some of the overlaps such as youth offending and additional learning needs. These services need to engage with both health, social care and education services but that is made difficult with the governance of collaboration operating in two places. In addition, we have considerable ambitions for the wellbeing of young people; for example, through the

first 1000 Days Project, our children's zone pilot bid and work with partners on Adverse Childhood Experiences (ACE). These too require collaboration across education, social care and health. Currently such collaboration is difficult for us because the footprints are different and, therefore, alignment within one footprint would be beneficial. There are also some losses of efficiency for the Police as the Basic Command unit has to also operate on two footprints – including supporting safeguarding boards in both ABMU and Cardiff and the Vale footprints.

The proposed Health Board boundary change would align Bridgend as firmly in an East facing footprint. Though this means a change to the governance of health services, it does safeguard local and national investment in the City Region structures and established arrangements for educational improvement. On balance therefore, we feel this health boundary change provides the best solution for meeting the needs of this local community in the medium to long term; it will allow the council and other significant partners to develop and deliver responses to community need through collaborative approaches on a consistent footprint.

**Question 2: Are there any issues, benefits or risks particular to the proposed boundary change that are not considered in this consultation or that you would like to comment on?**

Yes/No

Yes

Please comment here:

The migration of responsibilities between health boards is a complex one. In addition, we are aware that the financial positions of the two health boards are very different and will need to be factored in. In this context there are risks in seeing the exercise as one contained within the health service. Decisions taken by health boards will impact on existing progress made on health and social care integration in the county and will impact on our ability to drive integration and improvement further and faster. Wider considerations that impact on community health, public health and acute provision will also be of significant interest to the local population and therefore to this council as the body democratically elected to play a key role in local wellbeing.

Our suggested mitigation is a robust but proportionate programme management structure that oversees the planning and delivery of any changes. This should involve the two health boards, BCBC and Welsh Government as core members with appropriate opportunities identified to engage with other partners as required on specific elements (such as third sector, Police, Public Health Wales, other local authorities in the health board areas etc.)

There will be a need to recognise good practice from all parties in the new regional arrangements. Also a willingness to shift culture and practice as required needs to be evident to ensure the best outcomes for the population of the region whilst also understanding the need for local determination as appropriate. This should form part of the remit of the group or structures put in place to oversee the change.

There will be a potential impact on capacity for both Members and Officers of BCBC as we will have to 'straddle' two regions. There will be a transitional period when BCBC will be working with Western Bay to disengage from regional arrangements and yet simultaneously working with the Cwm Taf region, which is already established, to become an equal partner.

Equally it is likely that the two health boards will require some additional capacity to be identified to support this transition

**Question 3: If the boundary change is implemented, regulations under the Social Services and Well-being (Wales) Act 2014 will also need to be revised to re-align regional partnership boards and partnerships safeguarding children and adults. Are there any issues you would like to raise about consequential changes to Regulations under the Social Services and Well-being (Wales) Act?**

Yes/No

Yes

Please comment here:

The realignment of regional partnership boards should allow for working across both areas for a period of time to ensure that individual cases do not get missed between the key statutory agencies.

More fundamentally there is an opportunity to consider establishing a South Wales Safeguarding board that is coterminous with the South Wales Police Boundary. Moving Bridgend from one existing safeguarding board to another existing safeguarding board is a minimum requirement. However the opportunity for greater consistency, organisational learning and improvement and efficiency of operating a single board could be seized at this time.

**Question 4: Are there other Regulations or provisions under the Social Services and Well-being (Wales) Act or other legislation which should be considered for amendment if the proposed Heath Board boundary change is implemented?**

Yes/No

Yes

Please comment here:

The Western Bay Adoption Service would need legislative change to be dissolved from the current regional agreement to become part of the Vale, Valleys and Cardiff service. Welsh Government would need to consider an amendment to the regulations underpinning the creation of the National Adoption Service to reflect the new regional arrangements.

The national Fostering Framework is in infancy in terms of any regional working and as yet there is no legislation underpinning it. Bridgend will need to ensure that the needs of foster families within the Authority area are appropriately represented within the new region.

Carers across the region have expressed concern that the current services that they receive may change if the boundary change is implemented. Bridgend wants to ensure that there will be no detriment to Carers as a result of moving into a different regional arrangement. However, we recognize the potential for Carers in Bridgend to benefit from the alignment of all partnerships within the same region as this should enable a strong focus and 'parity of esteem' for Carers from all agencies across the sector

Independent Professional Advocacy for Children and Young People has been commissioned in Western Bay on a regional footprint, as mandated by Welsh Government as part of the National Approach to Advocacy. As such, current contractual arrangements for advocacy in Western Bay cover Swansea, Neath Port Talbot and Bridgend.

In Cwm Taf different contractual arrangements exist for RCT and Merthyr with a different provider having been commissioned. The change in boundary to Cwm Taf will require clear statutory guidance that acknowledges where existing contractual requirements are in place these will need to be managed in a transitional arrangement, allowing Bridgend and the other Authorities to also consider the practical requirements of their commissioned service provider.

**Question 5: Do you consider that the 1 April 2019 for the boundary change to take effect is realistic and achievable?**

Yes/No

Yes

Please comment here:

It is logical for the change to coincide with the beginning of a new financial year as regional grants and other financial settlements will be easier to disaggregate. Due to the significant work required BCBC proposes a transitional year before full implementation.

However, it is also important to give certainty to staff across the two health boards and BCBC that the change is real and expected to happen with pace. Therefore we consider that April 2019 allows for sufficient time to plan whilst also setting a clear expectation of pace and urgency.

This is important in order to ensure that there is a consistent focus on the necessary changes and that uncertainty is minimised. A longer, more protracted timetable would not support this. It would run the risk of drift and compromise the planning and delivery of key decisions and investments within and involving the health services.

**Question 6: The Welsh Language Impact Assessment published alongside this consultation paper outlines the Welsh Government's view of the effect of the proposal on the opportunities for people to use the Welsh language and treating the Welsh language no less favourably than the English language. In relation to the proposals set out in this consultation:**

**a) Are there any positive or adverse effects?**

Yes/No

No, not that we are aware of.

Please comment here:

Providing the Welsh language commitments are currently the same for ABMU as CWM Taf UHB and that Bridgend County Borough residents can continue to access services/admin facilities through their language of choice to the same level as they do now, then there appears to be no obvious positive or adverse effect for Welsh speakers in the county borough.

**b) Could the proposals be re-formulated so as to increase the positive effects or reduce any possible adverse effects?**

Please comment here:

N/A

**Question 7: The Equality Impact Assessment published alongside this consultation paper outlines the Welsh Government's view of the effect of the proposal on the opportunities for people to use the Welsh language and treating the Welsh language no less favourably than the English language. In relation to the proposals set out in this consultation:**

**(a) Are there any positive or adverse effects?**

See above response.

Please comment here:

The Welsh language is not mentioned in the accompanying EIA only in the Welsh language impact assessment – see response above.

**b) Could the proposals be re-formulated so as to increase the positive effects or reduce any possible adverse effects?**

Please comment here:

See above response

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: