

Vaughan Gething AM
Minister for Health and Social Services

Kirsty Williams AM
Minister for Education

8 August 2019

Dear Ministers,

Follow-up work on the Committee's inquiry into the Emotional and Mental Health of Children and Young People in Wales – Mind over Matter

We are writing to you following the public scrutiny sessions held on [20 June 2019](#) and [26 June 2019](#) to monitor progress in relation to the implementation of the recommendations we made in our April 2018 [Mind over Matter](#) report. We are grateful to you, and to the Chair of the Together for Children and Young People Programme, for your cooperation in undertaking this important follow-up work one year on from the [Plenary debate](#) on our report.

We acknowledge that progress has been made in some areas but still believe the pace of improvement needs to increase. We welcome the developments made to date, and recognise that the setting up of the Joint Ministerial Task and Finish Group—which I attend as an observer on behalf of the Committee—has helped to move progress in the right direction in respect of the development of a whole-school approach. However, we believe that increased effort is needed to deliver the step change in emotional and mental health support for children and young people we have called for. The [evidence](#) which underpins the conclusions and recommendations outlined in this letter is all available on our webpages.



1. Key recommendation

We are very concerned that the NHS-led service improvement programme, Together for Children and Young People, is coming to an end in October 2019 without adequate legacy arrangements being in place. We did not receive the assurances we sought—either from the Welsh Government, or the Together for Children and Young People Programme—that sufficient and robust arrangements are in place to deliver and sustain the improvements urgently needed in emotional and mental health support for children and young people across all areas of Wales.

Recommendation A: The key recommendation in our Mind over Matter report called for the emotional well-being and mental health of our children and young people should to be a national priority. Further to this, we recommend that the Together for Children and Young People Programme is extended to help ensure sustainable improvements in access to support services within both primary and secondary care through Child and Adolescent Mental Health Services (CAMHS), as well as supporting the whole-system approach. It is our view that the Together for Children and Young People Programme should be extended to coincide with the end of *Together for Mental Health 2012–22*, the Welsh Government’s 10 year strategy to improve mental health and well-being.

We believe

- rolling the Together for Children and Young People Programme forward is the best option in terms of value for money and improved outcomes for children and their families;
- the Together for Children and Young People Programme needs to have a stronger focus on multi-agency working, to ensure the delivery of whole-system improvements;
- the Together for Children and Young People Programme needs to work closely with the Welsh Government, local authorities and Regional Partnership Boards to support the development of local approaches and embed mental health and emotional well-being across all areas of Wales.



2. Whole-school approach

We welcome the progress made, driven by the Joint Ministerial Task and Finish Group, on the whole-school approach.

We are pleased that funding has been made available to develop additional modules on how teachers should support pupils' mental health and emotional well-being, and welcome the commitment we were given to ensuring this is included in the next accreditation process for teacher education.

We are also pleased that the Welsh Government has now recognised the importance of ensuring everybody who works with children and young people is **appropriately trained in emotional well-being and mental health**. However, we believe that such training should be included on a mandatory basis in ITE as a matter of urgency, and that a programme of CPD is developed for existing teaching staff, **and this should be done at real pace**.

Recommendation B: To ensure that all school staff have a sufficient understanding of children and young people's emotional and mental health and well-being, the Welsh Government should develop—as a matter of priority—a programme of compulsory training for new and existing school staff.

We share the Minister for Education's view that the **new curriculum** is “a wonderful opportunity to really embed health and well-being, in its broadest sense, into the work of schools, giving it parity with all the other areas of learning and experience that are included within the curriculum”.¹ However, we are still not convinced that there is sufficient alignment between the curriculum and initiatives around emotional well-being and mental health. It is our intention to explore this issue further with the Minister for Education during our public scrutiny session on the draft curriculum in September 2019.

We want to be assured that one of the central tenets of our Mind over Matter report—that emotional well-being, resilience and good mental health are the key foundations for successful learning—can truly be delivered by the inclusion of

¹ CYPE Committee, oral evidence, [RoP \[para 42\], 20 June 2019](#).



emotional well-being and mental health as one of the six Areas of Learning Experience (AoLE) and the 'what matters' statements.

We also want to see momentum maintained, to ensure that the implementation **framework for schools**—which will provide guidance and support for schools to embed a whole-school approach to mental health and emotional well-being—is published as soon as possible. We are pleased that the Welsh Government is reviewing the numerous initiatives in order to inform a national approach for schools and we recognise that developing guidance is a work in progress. We would like to see this framework taken forward at pace.

Linked to this, we are pleased to hear that the implementation framework for schools will include a dedicated section on **suicide and self-harm**. The publication of the guidance for schools in September 2019 on talking about suicide and self-harm is a significant step forward. It is a step in the right direction, and the Welsh Government must now put plans in place to ensure that all schools and local education authorities implement this guidance.

Recommendation C: Further to Recommendation 3 in our Mind over Matter report, the Welsh Government must ensure the implementation framework for schools is published without delay, by December 2019. This is to ensure that all schools are working to a fundamental set of principles in relation to children and young people's emotional well-being and mental health and are supported to do this. We want the Welsh Government to be working with schools to implement the guidance and to begin the self-evaluation process.

Recommendation D: Further to Recommendation 16 in our Mind over Matter report, the Welsh Government must ensure that all schools and local education authorities implement fully the guidance on suicide and self-harm to be introduced in September 2019.

We also want to reiterate our firm view that improving access to mental health support in schools must be part of a **whole-system approach**. We look forward to receiving a copy of the interim evaluation report on the CAMHS schools in-reach pilots in December 2019.



3. Local Primary Mental Health Support Services

In line with the whole-school approach, we want to see the Welsh Government set out clearer expectations on how **school counselling services** should link with Local Primary Mental Health Support Services (LPMHSS) to ensure they are joined up. We understand that the Welsh Government is doing some work to map the adequacy and capacity of the school counselling service, but we want the Welsh Government to better articulate its vision for lower level support and early interventions.

We cannot overstate this Committee's commitment to ensuring children and young people who are ineligible for CAMHS services are able to access other suitable therapeutic or lower level support – the so-called '**missing middle**'. It is crucial that the Welsh Government gets to grips with this issue so that children are able access the support they need. This works is still in its infancy and that is not good enough.

Recommendation E: We want to see the Welsh Government implement Recommendation 12 in our Mind over Matter report as a matter of urgency, including publishing details of it how it intends to take forward the early help and enhanced support workstream to reduce the 'missing middle'. We request an update from the Welsh Government on progress by the end of October 2019.

The delay in publishing the recent NHS Delivery Unit's **review of LPMHSS** is also not acceptable. As a Committee, we have made it clear that we expect the recommendations from the Delivery Unit's review to be published in full, as well as the Health Board improvement plans, in order to drive improvements and monitor implementation of the plans. We welcome the confirmation in the Minister for Health and Social Services' letter of 19 July 2019 that all fieldwork and data analysis has now been completed by the Delivery Unit and that health boards have either received a full written report or verbal feedback with a summary of findings, ahead of receiving a full report.

Recommendation F: Further to Recommendations 9 and 10 in our Mind over Matter report, we expect to receive a copy of the NHS Delivery Unit's review of Local Primary Mental Health Support Services, as well as the Health Board improvement plans, this summer (2019). Publication of this information will help to provide a better understanding of whether there is enough capacity in the primary care CAMHS



system. We also recommend that the Welsh Government publish data in relation to LPMHSS performance as soon as possible.

4. Specialist CAMHS

In our Mind over Matter report, we highlighted the importance of ensuring that **consistent care pathways**, based on **national referral criteria**, are implemented across Wales. It is still our view that real progress in specialist CAMHS can only be judged when children and young people can access timely services consistently, across the country, in a sustained manner.

The Framework for Improvement was published in June 2016, setting out a clear definition and referral criteria for specialist CAMHS. We welcome the Welsh Government's honesty in explaining that the right level of progress has not been made yet; and note that the Welsh Government could not give us the assurance that Health Boards are consistently applying the referral criteria.² We further note your acknowledgement that while waiting times data has improved, sustainable performance has not yet been achieved.³

We accept that the Welsh Government is working with Health Boards to implement CAMHS improvement plans to address these issues. We further accept that more time is needed to ensure consistent pathways and consistent referral criteria are in place, and to sustain waiting time performance. Nevertheless, we expect the Welsh Government to demonstrate sustained improvements in specialist CAMHS, including commissioning a review of the framework within the next 6 to 12 months.

Related to this, we have specific concerns about **crisis and out of hours care**, particularly in relation to some Health Boards still not providing services 24/7. We understand that crisis care will be included in Health Board improvement plans, but given the vulnerabilities of children and young people who are 'in crisis', access to support 24/7 needs to be prioritised. It is not acceptable that more than one year after our report, the Welsh Government cannot give us an accurate picture of how 24/7 access looks across Wales.

² CYPE Committee, oral evidence, [RoP \[para 194\], 20 June 2019](#).

³ CYPE Committee, oral evidence, [RoP \[para 173\], 20 June 2019](#).



Recommendation G: Further to Recommendation 15 in our Mind over Matter report, we recommend that the Welsh Government undertake an urgent piece of work to better understand how and why children and young people access crisis/out of hours support. Further improvements to crisis and out of hours care for children are needed to help ensure children and young people can access immediate support when they are in distress, at any time. Access to mental health crisis support must be consistent across Wales, which may require Welsh Government investment to support those Health Boards currently unable to extend their services.

5. In-patient care

We have serious concerns in relation to **in-patient care for children and young people** in Wales, which have also been highlighted by Healthcare Inspectorate Wales inspectors and the Children's Commissioner for Wales.

The Welsh Government's response to our report in relation to in-patient care (Recommendations 17 and 18) has been inadequate.

There has been a longstanding issue in terms of being able to properly **staff** the unit at Abergele in North Wales which is still not resolved. We called on the Welsh Government to intervene to help ensure Betsi Cadwaladr University Health Board could return the north Wales in-patient unit to its commissioned capacity of 12 beds by Summer 2018. A year later, the Minister for Health and Social Services told us that there is an extra bed open but the unit still is not fully staffed.

Further, since the publication of our 2018 report, **safety issues and quality concerns** have come to light in relation to the Regis healthcare facility in Ebbw Vale and Tŷ Lliidiard in Bridgend.

We support the decision taken not to place children and young people at the Regis facility while there are ongoing concerns about the quality of care provided. We also agree that admissions to Tŷ Lliidiard should be restricted until it is safe for children and young people deemed to be 'too high risk' to be placed there. However, this does mean that in-patient capacity in Wales is reduced and more children and young people could, as a result, be placed in units outside Wales, often a considerable distance from their homes and families.



Recommendation H: Further to Recommendations 17 and 18 in our Mind over Matter report, we want to see urgent action taken to address the demand pressures for in-patient care throughout Wales. We recommend the Welsh Government :

- ensure the capital works at Ty Llidiard are completed by the end of Summer 2019 and that the unit is in a position to accept children and young people at risk of suicide and self-harm;
- ensure the staffing issues at Abergele are resolved urgently so that the unit is in a position to accept children and young people at risk of suicide or self harm.
- explore with greater urgency options for creating extra in-patient capacity, specifically to cater for children and young people with complex needs who are currently placed outside of Wales;
- put in place more effective arrangements for ‘stepping up’ or ‘stepping down’ between different levels of intervention;
- provide capital investment to help progress at greater pace some of the opportunities for more integrated commissioning in relation to mental health, welfare and youth justice.

We understand that the NHS Collaborative is reviewing the **NHS Commissioning Framework** to ensure specialist in-patient services meet the needs of children and young people. However, we want to see further progress happening more quickly.

We welcome the confirmation in the Minister for Health and Social Services’ letter of 19 July 2019 that work is underway to look at how integrated planning and commissioning arrangements across health and social care can be taken forward. We ask the Minister to provide us with further details on this work by the end of the Summer 2019. We also look forward to receiving a copy of the **review of learning disabilities placements** following the Children’s Commissioner for England’s report in June 2019 as soon as possible.

Neurodevelopmental services

We are pleased to see new neurodevelopmental services in place across all Health Boards in Wales but we believe improvements are still needed urgently in this area. Specifically, more work is required to address the long **waiting times for assessment**.

In its [written evidence](#), Betsi Cadwaladr University Health Board told us there has been an increase in demand against last year, reporting a 56 per cent increase in referrals



for neurodevelopmental assessments in February 2019. The update also shows that, at the end of March 2019, there were 1,653 children and young people waiting for a neurodevelopmental assessment, of which 1,024 had waited over 26 weeks.

There is a real challenge for neurodevelopmental services, and we are not assured that all Health Boards are on track to deliver the improvements needed in these services.

Recommendation I: We recommend the Welsh Government fully implement Recommendation 13 in our Mind over Matter report in relation to neurodevelopmental services. Alongside this, the Welsh Government should:

- set out a clear plan of how it will support Health Boards, local authorities and third sector partners to meet the needs of the estimated 40–50 per cent of children and young people who do not meet the threshold for diagnosis but need some help, to ensure that families are not left feeling unsupported;
- routinely publish data on neurodevelopmental performance so that there is greater transparency and understanding of whether Health Boards are achieving the 26 weeks waiting time standard for assessment;
- provide further details of how the Welsh Government intends to monitor the performance of neurodevelopmental services, so that frontloading support into assessment to meet the 26 week waiting time standard for assessment is not done at the expense of providing interventions following assessment;
- publish the findings of the demand and capacity modelling work it is undertaking to ensure effective neurodevelopmental service models are in place across all areas of Wales.

6. Transitions

Transition guidance was published for the NHS in August 2017. This should ensure that all services are aware of the need to communicate and work flexibly with the young person in their care to deliver a planned flexible transition based on individual need. However, we are not satisfied that sufficient progress has been demonstrated in relation to the transition period. We were told that while the transition guidance is



very clear about what is expected, the Welsh Government could not evidence “genuine improvement” in how transitions are managed.⁴

Recommendation J: Further to Recommendation 19 in our Mind over Matter report, and given the heightened vulnerabilities of young people as they enter adulthood, we recommend that the Welsh Government consider all options for improving transitions, including exploring the extension of CAMHS up to the age of 25, to provide an extended period for young people to move into adult services, rather than immediately transferring to adult mental health services when they turn 18.

7. Psychological therapies

Like the Chair of the Together for Children and Young People Programme,⁵ we are disappointed that more progress has not been made in relation to psychological therapies for children and young people, despite additional investment being provided. The Minister for Health and Social Services puts the lack of progress down to an inability to recruit enough staff into the service, saying: “we are fishing in a pond, but there aren’t lots of fish”.⁶ We believe the Welsh Government needs to undertake more work in this area as a matter of priority.

Recommendation K: The Welsh Government should work proactively with the Health Education and Improvement Wales (HEIW) to ensure the CAMHS workforce is prioritised in the 10 year workforce strategy. We would welcome further information about plans for developing and maintaining a stream of sufficiently trained therapeutic practitioners to deliver interventions to children and young people.

We also note the consensus that publication and implementation of the children and young people’s **Matrics Cymru** will help to drive forward improvements. The Welsh Government’s Director of Mental Health told us “It is something that’s badly needed”.⁷

⁴ CYPE Committee, oral evidence, [RoP \[para 264\], 20 June 2019](#).

⁵ CYPE Committee, oral evidence, [RoP \[para 6\], 26 June 2019](#).

⁶ CYPE Committee, oral evidence, [RoP \[para 270\], 20 June 2019](#).

⁷ CYPE Committee, oral evidence, [RoP \[para 274\], 20 June 2019](#).



Recommendation L: Further to Recommendation 20 in our Mind over Matter report, we recommend the Welsh Government publish the children and young people’s version of Matrics Cymru by December 2019, alongside details of how this will help to ensure a range of therapeutic services across the spectrum of need are delivered effectively to children and young people across Wales.

In relation to **medication and prescribing**, we recognise that an initial review was undertaken in response to concerns around a particular type of antidepressant. We acknowledge the assurances from your CAMHS advisor that Health Boards are adhering to National Institute for Health and Care Excellence (NICE) guidelines on prescribing and the use of antidepressant medication for children and young people in Wales.⁸ Nevertheless, we remain concerned about prescribing trends as they relate to children and young people’s emotional well-being and mental health.

Recommendation M: Our view as expressed in Recommendation 20 of our Mind over Matter report, that a national review of prescribing trends for children and young people with emotional, behavioural and mental health problems is needed, remains unchanged. In the absence of such a review, we recommend the Welsh Government provide us with further assurances on this issue by December 2019.

8. Support for vulnerable groups, particularly care-experienced children

In our Mind over Matter report we expressed our particular alarm at reports from children’s services, adoption services and local authorities describing services for looked after children being at “breaking point” and “in crisis”, with joint working arrangements between the NHS and local government on therapeutic services described as arguably falling “backwards”.

We note the Welsh Government’s investment of £15 million into the Integrated Care Fund “to support prevention and early intervention services for care experienced children and young people” and welcome the work underway between Regional Partnership Boards, health boards, local authorities and third sector organisations to develop proposals to meet the needs of [their] looked after children populations.⁹

⁸ CYPE Committee, oral evidence, [RoP \[para 281\], 20 June 2019](#).

⁹ Correspondence, [Welsh Government to the CYPE Committee, 19 July 2019](#).



Nevertheless, given that care experienced children are some of the most vulnerable people in society, we are frustrated activity remains in the “proposals” stage only.

We note the Minister for Health and Social Services’ statement that work underway on Early Help and Enhanced Support is “linking with the Ministerial Advisory Group on Outcomes for Children and the Whole School Approach programme” and that “specific frameworks are planned to be developed and tested prior to the end of the [Together for Children and Young People] Programme in October 2019”.¹⁰

Recommendation N: The Welsh Government should provide more detail about—and evidence that—the workstreams of the Joint Ministerial Advisory Group on outcomes for children, the whole-school approach programme, and the Together for Children and Young People Programme are linked and working in tandem to ensure that the most vulnerable children and young people are having their emotional and mental health needs assessed and can access support promptly. The Welsh Government should provide a further detailed update to the committee on this, together with timescales for progressing this work. In the meantime, we remain deeply concerned about the provision of emotional well-being and mental health support for care-experienced children.

9. Youth work

The important role of youth work in supporting the emotional well-being and mental health of children and young people was emphasised in our original inquiry and in the inquiry that the Committee undertook on youth work at the start of this Assembly. In that light, we welcome the inclusion of a youth work representative in the work of the Joint Ministerial Task and Finish Group’s Stakeholder Reference Group. We further welcome the additional resource given to youth work, which the Minister for Education explained is an attempt “to redress some of the challenging financial situations that youth work has faced in the past, because we value the impact of that work”.¹¹ We agree with the Minister for Education that “youth work can make a massive difference” in the area of children and young people’s emotional well-being and mental health.¹² We also agree with the Chair of the Together for

¹⁰ Correspondence, [Welsh Government to the CYPE Committee, 19 July 2019](#).

¹¹ CYPE Committee, oral evidence, [RoP \[para 134\], 20 June 2019](#).

¹² CYPE Committee, oral evidence, [RoP \[para 134\], 20 June 2019](#).



Children and Young People Programme that “youth work has perhaps not [had] the recognition that it’s needed”.¹³

Recommendation O: The Welsh Government must ensure that within its Draft Budget for 2020–21, and in future financial years, sufficient funding is allocated to youth work in recognition of the vital role it has to play in supporting the emotional well-being and mental health of children and young people.

10.Funding

Finally, we want be clear that we welcome the £7.1 million investment [announced](#) earlier this year to implement the recommendations in our Mind over Matter report. It is a positive development. However, we are mindful that some of this money could be used to supplement existing workstreams, and some of the funding set aside for CAMHS improvement work for 2019–20 has not yet been released to Health Boards. It is therefore our intention this year (in line with Recommendation 27 in our Mind over Matter report), for the emotional and mental health for children and young people to be a focus for our oral evidence session on the **Welsh Government Draft Budget 2020–21**. Relevant information will be requested from the Welsh Government and Health Boards to inform this work.

We look forward to receiving your response to this letter and our recommendations.

Yours sincerely,



Lynne Neagle AM
Chair

¹³ CYPE Committee, oral evidence, [RoP \[para 8\], 26 June 2019](#).

