

**Consultation
Response Form**

Your name: **Sarah Capstick**

Organisation (if applicable): **Wales Safer Communities Network**

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Question 1: This draft Substance Misuse Treatment Framework (SMTF) is designed to inform and assist health, social care and criminal justice planners and providers to design and deliver high quality, sustainable and equitable prevention and treatment services children and young people, specifically for those at risk of, or experiencing substance misuse issues. Would you agree the draft SMTF does this?

Yes	Partly <input checked="" type="checkbox"/>	No
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Question 1a: If you have answered partly or no could you please tell us what additional information is needed?

Community Safety Partnerships and Public Service Boards also have a role to play in supporting the delivery of the Framework, many of the consequences of substance use falls into these areas of work e.g. anti-social behaviour, violence and acquisitive crime as examples. In addition, exploitation and modern slavery is often linked with substance misuse or the production and delivery of substances, which cross over with criminal justice who are named but also the community safety partnerships and regional safeguarding boards who do not seem to be as prominently included as we would expect.

The Police and Crime Commissioners in Wales commission drug intervention programmes some of which provide support to the under 25s but are not acknowledged within the roles and responsibilities on page 14. This may suggest that the commissioned programmes sit outside the Framework which would appear to go against the ethos of both the Framework and the Wellbeing of Future Generations (Wales) Act 2015 and Social Services and Wellbeing (Wales) Act 2014 both of which have collaboration and partnership as important for delivering services and support to those who require it in Wales.

Question 2: Do you agree the recommendations, as they are proposed in Section 1, are fit for purpose and achievable?

Yes	Partly <input checked="" type="checkbox"/>	No
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Question 2a: If you have answered partly or no could you please tell us what additional key areas or changes you would wish to see?

They appear to deal with the other elements with the exception of offending and re-offending, there is no mention for example of the Youth Violence Prevention Framework which the Violence Prevention Unit have been developing or the Race Equality Action Plan that Criminal Justice in Wales have developed following on from the Wales Government Action Plan. Criminal Justice and Community Safety operate across the devolved and non-devolved legislative landscape and the document doesn't appear to reflect this element.

Looking at the list of authors involved in drafting there does not appear to be anyone with a background in either criminal justice (away from the Youth offending teams) or community safety, we would encourage engagement in these areas before the framework is finalised so that there is a greater possibility of success in meeting the proposed aims of the framework.

Question 3: Do you see any service delivery challenges in delivering any of the recommendations?

Yes	Partly ✓	No
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Question 3a: If you have answered partly or no could you please tell us what additional challenges you would anticipate?

The criminal justice system operates across England and Wales and specific laws and legislation identify the age for an adult, there will need to be clear communications so that those within the criminal justice system have access to all the correct information on what is and is not available to individuals.

The delivery of a single assessment tool which also stretches across criminal justice will require agreement and sign off with the UK Government (Home Office/ Ministry of Justice) or risk criminal justice colleagues having to complete multiple reporting to achieve the requirements of both the substance misuse framework but also the criminal justice reporting system.

Question 4: In your view, does the proposed SMTF link well with other relevant policy and service areas?

Yes	Partly ✓	No
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Question 4a: If you have answered partly or no can you tell us what feel is missing and what you recommend we add?

Please see previous comments in regards to community safety, public service boards and criminal justice.

Question 5: We would like to know your views on the effects that the draft SMTF would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

The recommendations could be strengthened to include cultural promotion and language preference (Welsh and English) in service delivery and design.

Question 6: Please also explain how you believe the proposed SMTF could be changed so as to:

- have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and
- have no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

The recommendations could be strengthened to include cultural promotion and language preference (Welsh and English) in service delivery and design.

Question 7: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

We welcome the framework and that it is looking beyond just the traditional approach to substance misuse, we do feel the relationship with community safety and criminal justice could be strengthened and by doing so break down any possible boundaries or gaps that may form between the areas of work.

Introduction to the Wales Safer Communities Network

The Wales Safer Communities Network was established in January 2021 following the recommendations of the Welsh Government's Working Together for Safer Communities Review. The Network aims to become the strategic voice for community safety in Wales, working collaboratively to champion and support community safety partnership working, and influence the shaping and development of national policy and local practice. This response is on behalf of the Network and not WLGA.