



CITIZEN VOICE BODY - GUIDANCE ON ACCESS, REPRESENTATIONS AND NHS SERVICE CHANGE

February 2023

Introduction

The Older People's Commissioner for Wales welcomes the opportunity to respond to the Welsh Government's consultation on the Citizen Voice Body - guidance on access, representations and NHS service change. The Commissioner has had a constructive relationship with the Board of Community Health Councils and looks forward to working with the new body.

In the meantime, the Commissioner has the following comments on the draft Code of Practice and guidance.

Access to vulnerable people

It is essential that the Citizen Voice Body (CVB) has the power and makes every effort to amplify the voices of the most vulnerable and least heard people in society, including older people living in care homes, older people in hospital and those living alone in the community. The Commissioner believes that the Code of Practice must ensure that the CVB has direct access to those people, even in the most challenging circumstances such as a pandemic.

The draft Code of Practice on access to premises states that the CVB must request access to premises and that the service provider decides whether to permit this, having regard to the principles in the code of practice, unless a citizen has contacted the CVB and asked to share their views, or if the CVB is supporting them with an issue. Although the draft Code of Practice states that there is a presumption in favour of access, the Commissioner would like reassurance that this presumption will be maintained even in the most challenging circumstances, such as a pandemic, and that the CVB will have appropriate access to the most vulnerable older people, to hear their voices and help ensure that their rights are upheld.

For further information, please contact:
Valerie Billingham, Health and Care Lead
03442 640 670 // Valerie.billingham@olderpeople.wales

Service change

The Commissioner understands that, according to the draft guidance for engagement and consultation on changes to health services, it will be Health Boards and not the CVB who determine what constitutes substantial service change, and that the CVB will have powers to make representations to Health Boards and to Ministers, but not to refer a service change to Ministers for determination. This change may help to free up the CVB to concentrate on ensuring that citizens' voices are properly heard within the service change process. However, the Commissioner believes that, in the interests of consistency across Wales, it would be helpful to include examples of what constitutes substantial, medium level and minor service changes within the guidance.

The Commissioner welcomes the statement in the guidance that it is important that NHS organisations work in partnership with their communities and develop proposals in a genuinely co-productive way, and agrees that, if proposals are developed and planned through co-production, they are more likely to be supported and deliver improvements in care and respond to the needs of the patients and communities that the NHS is there to serve.

Cross-boundary working

The Commissioner also welcomes the statement in the statutory guidance on representations made by the CVB that the CVB will play a key role in informing the design of future health and care systems through representing the views of the public along pathways of care, spanning health and social care, and also across boundaries. It is essential that the views and experiences of older people as they move between health and social care, for example when older people who need domiciliary care or who live in a care home are being admitted to and discharged from hospital, are considered across their whole health and care journey, if we are to have truly patient-centred, integrated health and care services.

The Commissioner and her team would be happy to discuss any of these comments further.

The Older People's Commissioner for Wales

The Older People's Commissioner for Wales is an independent voice and champion for older people throughout Wales.

The Commissioner is taking action to protect older people's rights, end ageism and age discrimination, stop the abuse of older people and enable everyone to age well.

The Commissioner is working for a Wales where older people are valued, rights are upheld and no-one is left behind.

How to contact the Commissioner:

Older People's Commissioner for Wales
Cambrian Buildings
Mount Stuart Square
Cardiff
CF10 5FL

Phone: 03442 640 670

Email: ask@olderpeople.wales

Website: www.olderpeople.wales

Twitter: [@talkolderpeople](https://twitter.com/talkolderpeople)