



## **A Trauma Informed Framework for Wales – The Wallich Consultation Response**

### *About The Wallich*

The Wallich wants to create a Wales where people stand together to provide hope, support and solutions to end homelessness.

As Wales's largest homelessness and rough sleeping charity, The Wallich operates under three core objectives: getting people off the streets; keeping people off the streets; and creating opportunities for people.

Running 108 diverse projects, across 18 local authorities, The Wallich works with more than 7,000 people experiencing or at risk of homelessness every year across Wales.

*Question 1: Before reading this document how familiar were you with the concept of a trauma informed approach? Do you agree it should be a priority for everyone in Wales?*

As an organisation, The Wallich is very familiar with the concept of trauma-informed approaches. We have taken specific steps to embed it within all areas of the work we do. We agree that it should be a priority for all public services in Wales; especially for those services which are likely to regularly come into contact with people who have experienced complex trauma. These include housing, health, and criminal justice services.

The Wallich first became aware of the concept of trauma-informed service delivery a number of years ago, as part of our journey to develop Psychologically Informed Environments (or PIEs). This was the conversation across the Welsh housing and homelessness sector, in order to better design services, in order to be more compassionate and person-centred. In many ways this work was simply recording and formalising best practice that was already taking place in our most successful projects. However, it has been incredibly useful to re-examine our processes and resources through the perspectives of trauma and interpersonal relationships.

PIE approaches are now expected as standard across our sector, and the Housing Support Grant guidance explicitly requires consideration of PIEs for all commissioned services.

We feel that that our shift towards trauma-informed approaches has been transformational for The Wallich. This emphasis on compassion and understanding to build communities is now being embedded through our organisational values. Therefore, we can be confident in our hope for trauma-informed

approaches becoming embedded across Welsh public services. Collaboration and partnership working, in particular, will be significantly enhanced by a common understanding of trauma across all agencies involved in delivering care and support.

*Question 2: We would like to know your views on the aims of this framework, specifically whether it reflects the experience of adversity and trauma*

Yes, the aims of the framework are sensible and appropriate for this stage in the development of greater national understanding of trauma and how it can present in public services. In particular, the aim to create a consistency of understanding will be hugely valuable if it means that people with experience of trauma are able to access compassionate, person-centred services wherever and however they need them. It can be a really big step to ask for help after an adverse experience, so there must be no wrong door to knock on.

*Question 3: Is there anything missing in the overall approach set out in this document?*

No, the structure of the framework is appropriate for a high-level overarching document. It creates a base upon which further resources and actions can be developed for more specific purposes.

*Question 4: Thinking about the definition of a trauma-informed approach proposed in this document, is there anything missing?*

The definition in the current draft framework is accurate, although quite lengthy and somewhat academic in its wording. It is perhaps not worded in the most effective way for embedding amongst the people delivering these services and indeed comprehension of service users.

Instead, we would recommend setting out a simple, single-sentence definition of a trauma-informed approach – something along the lines of ‘A Wales that recognises and responds to trauma in a compassionate and respectful way’.

Having set out a definition in a simple, easy to understand headline, the framework could then go on to outline examples of what an effective, trauma-informed approach might look like in different settings. For example, it could consider behaviours or body language which service users may exhibit when presenting to services, and how service staff might respond to ease, rather than escalate the situation. To make this relevant to wide variety of sectors, examples could consider scenarios as they might occur in health settings, schools, police or probation. These could also be further developed into sector-specific resources, which could be developed after the framework is finalised.

Additionally, it is important to be clear on the differences between trauma-informed care and psychologically informed environments (PIEs), to avoid muddling the two distinct concepts. A mature understanding of trauma is of course a key pillar of PIE approaches. However, there is also a wider remit on diversity and accessibility, encompassing other service user needs such as Autistic Spectrum Disorders, learning disabilities or acquired brain injuries, for example.

*Question 5: The approach set out in this framework is underpinned by 5 practice principles; are they right? Is there anything else that should be included?*

Yes, we are broadly supportive of these principles. We particularly appreciate the emphasis on the importance of building strong relationships, as we feel that this is at the core of successful trauma-informed working. Supportive relationships must be accepting, non-judgemental and appropriate to the needs of the person as they are; not how we might wish they would be.

*Question 6: The trauma-informed practice framework has four practice levels. Are the differences between each of these levels clear, and can you see who they might be aimed at?*

Broadly yes, and the examples given in the framework are useful in setting out what each practice level should look like. We can foresee that there may be some crossover between the second and third levels, of 'Trauma Skilled' and 'Trauma Enhanced', as these levels may be appropriate for individuals within the same organisation, with the determining factor being the amount of time spent working directly with clients. This may vary significantly from day to day, but it will be important that staff have the appropriate knowledge and skills for effective trauma-informed working.

We also need to raise concerns about the lack of specialist intervention services identified at the fourth practice level. There are limited services to support people with drugs and alcohol, crisis mental health and, of course, the criminal justice system. However, crucially these do not offer treatments for trauma itself, rather they respond to trauma-responses as 'symptoms'.

Although somewhat outside the remit of this framework, we remain concerned that specialist service provision is inconsistent across Wales. In our experience, there are inadequate resources to provide effective treatment and rehabilitation to everyone who has experienced poor mental health or substance misuse *as a consequence* of trauma. Far too often, crises are allowed to escalate to a point where a person is arrested and even imprisoned, traumatising them even further. Effective prevention (such as embedding trauma-informed working across all of society) is part of the solution, but there needs greater investment in specialist therapies to address the root cause of trauma in people's lives, and this needs to be available in all parts of Wales.

*Question 7: Within the practice levels, is the support that might be received in each level clear, and do you have any further examples of what good looks like in relation to this?*

Yes, the examples provided in the framework are clear and useful demonstrations of each practice level. Broadly speaking, the language is clear and appropriate for practitioners who are used to thinking about trauma-informed approaches. However, the language could potentially be simplified in order to be clearer for those who this will be completely new.

As mentioned previously, there needs to be worked examples of good practice for a variety of different sectors and practice levels. They will need to be pitched differently to be appropriate for different

audiences. These examples, along with an easy read version of the framework could be developed later as resources to supplement the overarching framework.

*Question 8: Thinking about trauma-informed organisations and systems, is it clear how the definition, 5 principles, and practice framework applies?*

Again, yes, it is broadly clear, but in order to get the best view it would be useful to run through the TrACE Self-Assessment process as an organisation, and then feedback as to how well we are working according to the principles and the wider practice framework.

It might also be useful to develop a lighter-touch self-assessment process; one that will not be as onerous for organisations who are not as far along in their understanding and implementation of trauma-informed working. This could simply take the form of a few questions to provoke self-reflection about how an organisation thinks about its services for clients, and how it could be more considerate and accommodating of diverse experiences. This could be a useful exercise for organisations who are not quite ready or willing to undergo the more rigorous TrACE process.

*Question 9: The practice framework aims to exemplify the approach it sets out; does it achieve this in the tone, language and inclusivity of diverse lived experience?*

Yes, the process of consultation to develop and refine the framework has been useful in drawing upon the experiences of people working in a range of different sectors. As a result, the language used is appropriate for professional contexts. In order to be more accessible to more people, both delivering and receiving trauma-informed public services, an easy-read version would be useful, distilling the key principles and the levels of compassion and respect that are expected of everyone.

*Question 10; We want to understand your thoughts on implementation of the framework. What are the challenges to putting this into practice, and what else might you need to do so?*

Implementation will be key to assessing the success of the framework, and we foresee that this will be a significant challenge, as culture and processes will not simply change overnight. Once this framework has been finalised and agreed, there will be significant work to communicate the principles and models of practice to organisations across Wales. We must build communities and networks of good practice across every sector. We at The Wallich are committed to doing our part in supporting this.

We feel strongly that the best possible outcomes will only be achievable if there is a consistency of trauma-informed service across all partner organisations we work with. In our case, this means not just other third sector providers of housing or substance misuse services, but also local authority departments, police and HMPPS. We never want to risk potentially retraumatising our clients when we refer them to other services.

Another key element of successful trauma-informed services is the design of systems and processes to be more psychologically aware, ensuring that structures are in place that meet the needs of clients; rather than some other arbitrary externality. This means collecting personal information in a sensitive

way, and then storing it and using it appropriately so that clients are not constantly asked to redisclose things that may be difficult to talk about. Part of ensuring there is no wrong door when asking for help, means effective communication between agencies about the needs of individual clients, but also creating safe environments that are welcoming and supportive for clients regardless of whether they have experienced trauma.

We are interested to know what will be the statutory basis underpinning the final framework, to ensure that public services adopt trauma-informed approaches and can be held accountable to the aims of the framework. If Welsh Government decide to legislate in this area, we will of course examine those proposals carefully. However, if that does not happen, we would like to see robust arrangements for monitoring the implementation of the framework. This responsibility could be delegated to a body like the Future Generations Commissioner, the Public Services Ombudsman, or even Audit Wales, but it is essential that somebody takes ownership of this agenda and pushes all organisations to make it a reality.

Alongside developing new services and reviewing existing provision, public service organisations must also address stigma, and they must challenge preconceptions about trauma. Part of this means not becoming too fixated on adverse childhood experiences. Yes, trauma in childhood is extremely important, and can significantly effect later life, but adverse experiences can affect anybody of any age, and no one should feel that their experiences are less valid. Challenging stigma is essential to make it clear that it is never too late for someone to receive support and overcome adverse life experiences.

Finally, we would just like to reemphasise the importance of trauma-aware commissioning of public services, to ensure sustainable financing of these approaches. In order to develop psychologically informed environments, services need sufficient funding to meet local needs without compromising on safe staffing levels, reflective practice, continuing professional development and, of course, without over-relying on temporary or agency staff to manage short-term pressures. The Wallich, like many third sector providers, run services typically commissioned through the Housing Support Grant. Although the HSG guidance explicitly mentions that services must be trauma-informed, all too often a race to the bottom on price means this cannot be reliably delivered without additional funding from elsewhere. Hopefully this national framework will help drive up standards across service providers and commissioners, to ensure that people can access trauma-informed services wherever they are in Wales.