Llais Response to the Welsh Government Rural Proofing and Environmental Sustainability White Paper

About Llais

Llais is the independent statutory body that reflects the views and represents the interests of people living in Wales in their National Health Service (NHS) and social care services.

We operate locally, regionally, and nationally. We work with people and communities in all parts of Wales so that everyone's voice can be heard, and used, to drive the planning, design, development and delivery of health and social care services for everyone. We:

- reach out to hear from people within our local communities through an ongoing programme of engagement activities. We do this so that people know about and understand what we do, and to gather their views and experiences of NHS and social care services. We do this in lots of ways, face to face and digitally, including visiting places where people are receiving health and social care services
- use what we hear to help health and social care services better understand how those of us who may need, and use services think services are meeting their needs, in the way that matters most to them. We help make sure the NHS and social care services takes action to make things better where this is needed.
- This includes working with health and social care services leaders when they are thinking about making changes to the way services are delivered, so that people and communities have their say from the start
- provide a complaints advocacy service that is free, independent and confidential to help people to raise their concerns about health and social services

We have operated in Wales since 1 April 2023. Our response reflects what we have heard directly and through others, particularly from people:

- who have engaged with us at regional and national events
- who have used our complaints advocacy service to raise a concern about their experience as
- people living in rural and remote communities across Wales;
- community transport providers, voluntary organisations and community groups supporting rural populations; and
- organisations representing the interests of people who may experience barriers to accessing services because of geography, transport, digital exclusion or poverty.

Our response to the Welsh Government's White Paper on Rural Proofing and Environmental Sustainability focuses on the proposed statutory rural proofing duty, reflecting both our role as the independent statutory body representing people's views and experiences of health and social care services in Wales, and our interest as a public body proposed to be within scope of the duty.

We work with people, communities, service providers, decision-makers and partners across Wales to ensure people's experiences help shape services and decisions. Through our engagement activity, complaints advocacy service and wider work, we hear directly from people about the realities of accessing and using services in urban, rural and remote communities.

Distance, transport, workforce challenges, digital exclusion, access to services, affordability and availability of support can all affect people's ability to access the care and services they need. We welcome the opportunity to contribute to the development of a statutory framework that will make sure rural considerations are consistently reflected in decision-making.

General Position

Llais welcomes the proposal to introduce a statutory rural proofing duty and supports the principle that the circumstances, experiences and needs of rural communities should be considered consistently, transparently and at an early stage of policy development, service planning and decision-making.

Through our work with people and communities across Wales, we hear regularly about the impact that geography, transport, workforce availability, digital access and wider infrastructure can have on people's ability to access services and support. These factors often interact and can create additional barriers for people living in rural communities.

We recognise the opportunity the proposed duty presents to strengthen how rural experiences are reflected in decision-making and to support a greater understanding of how policies and services are experienced in practice.

However, the success of the duty should not only be measured by whether rural proofing has taken place. Ultimately, its effectiveness should be judged by whether it contributes to decisions that better reflect the realities of rural life, supports fairer access to services and reduces barriers experienced by rural communities. As with any improvement activity, a useful test is whether people can see and feel the difference.

Llais would encourage Welsh Government to ensure that the duty remains practical, proportionate and focused on outcomes rather than compliance.

People's Voices and Lived Experience

Llais believes one of the greatest opportunities presented by the proposed duty is the potential to strengthen the role of lived experience within decision-making.

People's experiences provide important insight into how policies and services operate in practice. They help identify barriers that may not always be visible through quantitative data and can improve

understanding of the cumulative impact that decisions can have on people's everyday lives.

Through our engagement, advocacy and representation work, we regularly hear about issues including transport costs, difficulties accessing appointments, digital exclusion, caring responsibilities, limited availability of local services and challenges accessing services through the medium of Welsh. These experiences provide valuable insight into how people experience services and should be recognised as an important source of evidence within the rural proofing process.

Public bodies should be able to demonstrate:

- who they engaged with;
- how rural communities were involved;
- what issues were identified;
- how views informed decision-making;
- what changed as a result; and
- how feedback was provided to communities.

This approach aligns closely with the Llais People's Principles, which emphasise the importance of listening early, enabling people to influence decisions and demonstrating how their contribution has made a difference.

Rural Proofing as a Matter of Equity and Fairness

Llais would encourage Welsh Government to frame rural proofing as an issue of equity and fairness.

The challenges associated with rurality are often experienced alongside other factors including age, disability, poverty, unpaid caring responsibilities, long-term health conditions and digital exclusion. As a result, people can experience multiple and interacting barriers when accessing services and support.

Through our work, we hear particularly strong concerns from unpaid carers living in rural communities. Caring responsibilities are often experienced alongside travel requirements, transport limitations, work commitments and restricted access to local support, creating additional pressures for people who are already providing substantial levels of care.

We regularly hear about the impact of:

- longer travel distances;
- limited public transport options;
- higher travel costs;
- workforce shortages;
- digital exclusion;
- reduced availability of local services;
- difficulties accessing specialist provision;
- challenges accessing services through the medium of Welsh;
- difficulties accessing primary care and NHS dentistry;
- difficulties accessing domiciliary care and community-based support;
- pressures on unpaid carers; and
- reduced visibility and availability of preventative and early intervention services.

Effective rural proofing should recognise how geography can interact with wider inequalities and affect different people and communities in different ways.

Health and Social Care Considerations

The proposed duty has particular relevance for health and social care services.

Through our engagement and advocacy work, people frequently describe how their experiences are shaped not only by the services available, but by whether those services can be accessed easily and practically in everyday life.

People's experiences are influenced by factors such as travel times, transport availability, affordability, workforce availability, digital access, caring responsibilities and whether support is available closer to home. These issues can affect both access to services and people's ability to benefit from them.

Rural proofing provides an opportunity to encourage earlier and more consistent consideration of these factors within service planning and decision-making.

Llais believes organisations should consider issues including:

- access to primary and community care;
- NHS dentistry;
- mental health support;
- urgent and emergency care;
- specialist healthcare;
- social care provision;
- domiciliary care and care at home;
- support for unpaid carers;
- outreach and mobile services;
- prevention and early intervention services;
- hospital visiting and family support;
- travel time and transport availability;
- affordability of access;
- digital inclusion;
- workforce sustainability; and

- Welsh-language services.

Consideration of these factors can help ensure that decisions better reflect the realities experienced by people living in rural communities.

Cross-Boundary and Cross-Border Considerations

Llais would also encourage Welsh Government to ensure that the duty reflects the way people access services in practice.

Through our work, we regularly hear from people whose care and support crosses organisational, local authority, health board and national boundaries. For many people, particularly those living in rural and border communities, these arrangements are a normal part of everyday life.

People do not experience services through organisational structures. They simply expect services to work together, information to move with them and responsibilities to be clear.

Where this does not happen, people can experience delays, uncertainty and difficulties understanding who is responsible for different aspects of their care and support. These themes emerge consistently through our work, particularly in relation to services that operate across geographical and organisational boundaries.

The proposed duty provides an opportunity to encourage greater consideration of:

- cross-border service arrangements;
- continuity of care;
- information sharing;
- travel and transport routes;
- patterns of service use;
- regional partnerships;
- cross-boundary service delivery; and
- the cumulative impact of decisions made by different organisations.

Without such consideration, there is a risk that decisions that appear appropriate from an organisational perspective may not reflect the realities experienced by the people affected.

Transparency and Accountability

Llais believes transparency will be essential to the credibility and effectiveness of the duty.

Communities are more likely to have confidence in decisions when organisations can clearly demonstrate:

- what issues were identified;
- what evidence was considered;
- what options were explored;
- how rural impacts influenced decisions;
- what changes were made as a result; and
- how outcomes will be monitored and reviewed.

We also believe it is important that organisations are able to demonstrate how rural proofing influenced the final decision. People who contribute their views should be able to understand how those views and experiences were considered and what difference the process made.

Reporting arrangements should focus on learning, improvement and accountability rather than evidencing completion of a process.

Clear accountability will help ensure rural proofing becomes a meaningful part of decision-making rather than a compliance exercise.

Implications for Llais

As an organisation that works with people and communities in all parts of Wales, including many rural and remote communities, Llais already considers the impact that geography, transport, access and availability of services can have on people's experiences.

These issues arise through our engagement activities, our representation work, our policy and influencing activity, and through the intelligence gathered via our independent complaints advocacy service.

The proposed duty has the potential to strengthen the visibility of rural experiences within decision-making processes and support greater understanding of how geography influences people's access to services and support.

We would support an approach that builds upon existing evidence, lived experience and engagement activity rather than creating separate or duplicative processes.

It will also be important that implementation supports Llais's independent role in representing the views and interests of people and communities affected by decisions.

Conclusion

Llais welcomes the proposal for a statutory rural proofing duty and recognises the opportunity it presents to strengthen how the experiences of rural communities are reflected in decision-making.

Through our work, people tell us that access to services is shaped not only by what is available, but by wider factors including transport, distance, affordability, workforce availability, digital access and community infrastructure. These realities are often interconnected and can have a significant impact on people's ability to access the services and support they need.

We believe the greatest value of the proposed duty will be realised if it helps ensure that lived experience sits alongside other forms of evidence and contributes to decisions that are better informed by the realities of rural life.

Ultimately, success should be measured not by the completion of a rural proofing assessment, but by whether people living in rural communities experience fairer access, fewer barriers and greater confidence that decisions have taken account of the issues that matter to them.