

**The Emergency Ambulance Services Committee**

**Annual Report**

**2020-2021**

**EMERGENCY AMBULANCE SERVICES COMMITTEE**

**ANNUAL REPORT**

**2020-2021**

1. **FOREWORD**

As Chair of the EASC, I am pleased to commend this annual report, which has been prepared for the attention of the EAS Committee and reviews the work of this Committee for the financial year 2020 - 2021.

**2. INTRODUCTION AND Scope of Responsibility**

In accordance with the Emergency Ambulance Services Committee (Wales) Directions 2014 (2014 No.08), the Local Health Boards (LHBs) established a Joint Committee, which commenced on 1 April 2014, for the purpose of jointly exercising its Delegated Functions and providing the Relevant Services.

In establishing the Emergency Ambulance Services Joint Committee (EASC) to work on their behalf, the seven Local Health Boards (LHBs) recognised that the most efficient and effective way of planning these services was to work together to reduce duplication and ensure consistency.

The Emergency Ambulance Services Committee (EASC) (Wales) Regulations 2014 (SI 2014 No.566 (W.67)[[1]](#footnote-1) make provision for the constitution of the “Joint Committee” including its procedures and administrative arrangements. The Joint Committee is a statutory committee established under sections 11, 12(3), 13(2) (c) and (4) (c) and 203(9) and (10) of and paragraph 4 of Schedule 2 to the National Health Service (Wales) Act 2006(1). The LHBs are required to jointly exercise the Relevant Services.

In December 2015, the Welsh Ministers directed the Health Boards under the EASC (Wales) (Amendment) Directions 2016 No.8 (W.8)[[2]](#footnote-2) to be responsible for commissioning Non-Emergency Patient Transport (NEPT) services via the Emergency Ambulance Services Committee from April 2016. The Cwm Taf Morgannwg University Health Board (CTUHB) is the identified host organisation. It provides administrative functions for the running of EASC in line with the Directions and has established the Emergency Ambulance Services Committee Team (EASCT) and appointed the Chief Ambulance Services Commissioner as per Direction 8(4), 3 of the Emergency Ambulance Services Committee and related Regulations.

The Emergency Medical Retrieval and Transfer Service went live on the 27April 2015. The service was commissioned “to provide advanced decision making & critical care for life or limb threatening emergencies that require transfer for time critical specialist treatment at an appropriate facility.” The service represents a joint partnership between NHS Wales, The Wales Air Ambulance Charity Trust (WAACT) and Welsh Government. The service was initially commissioned by the Welsh Health Specialised Services Committee; however, this function transferred to the Emergency Ambulance Services Committee on the 1April 2016.

**3. PURPOSE**

The Joint Committee has been established for the purpose of jointly exercising those functions relating to the commissioning of emergency ambulance services (EMS), non-emergency patient transport services (NEPTS) and the emergency medical retrieval and transfer services (EMRTS) on a national all-Wales basis, on behalf of each of the seven LHBs in Wales.

LHBs are responsible for those people who are resident in their areas. Whilst the Joint Committee acts on behalf of the seven LHBs in undertaking its functions, the duty on individual LHBs remains, and they are ultimately accountable to citizens and other stakeholders for the provision of emergency ambulance services (EMS), non-emergency patient transport services (NEPTS) and the emergency medical retrieval and transfer services (EMRTS) for residents within their area.

The Joint Committee’s role is to:

* Determine a long-term strategic plan for the development of emergency ambulance services and non-emergency patient transport services in Wales, in conjunction with the Welsh Ministers
* Identify and evaluate existing, new and emerging ways of working and commission the best quality emergency ambulance services (EMS), non-emergency patient transport services (NEPTS) and the emergency medical retrieval and transfer services (EMRTS).
* Produce an Integrated Medium Term Plan, including the balanced Medium Term Financial Plan for agreement by the Committee following the publication of the individual LHBs Integrated Medium Term Plans
* Agree the appropriate level of funding for the provision of emergency ambulance services, non-emergency patient transportservices and emergency medical retrieval and transfer services at a national level, and determining the contribution from each LHB for those services (which will include the running costs of the Joint Committee and the EAS Team) in accordance with any specific directions set by the Welsh Ministers
* Establish mechanisms for managing the commissioning risks
* Establish mechanisms to monitor, evaluate and publish the outcomes of emergency ambulance services, non-emergency patient transportservices and emergency medical retrieval and transfer services and take appropriate action.

In March 2014, the Joint Committee approved the revised Governance and Accountability Framework including the Standing Orders. The Standing Order were reviewed and updated in March 2021 and further work is underway on updating the Memorandum of Understanding with the Welsh Governance and the Hosting Agreement with Cwm Taf Morgannwg (CTMUHB).

These Joint Committee Standing Orders (Joint Committee SOs) form a schedule to each LHB’s own Standing Orders and have effect as if incorporated within them.

Together with the adoption of a scheme of decisions reserved to the Joint Committee; a scheme of delegations to officers and others; and Standing Financial Instructions (SFIs), they provide the regulatory framework for the business conduct of the Joint Committee. The Standing Financial Instructions are in the process of development.

These documents, together with a Memorandum of Agreement setting out the governance arrangements for the seven LHBs and a hosting agreement between the Joint Committee and Cwm Taf Morgannwg University Health Board UHB (“the Host LHB”), form the basis upon which the Joint Committee’s governance and accountability framework is developed. Together with the adoption of a Values and Standards of Behaviour framework this is designed to ensure the achievement of the standards of good governance set for the NHS in Wales.

A hosting agreement also exists between the Joint Committee and the host LHB (Cwm Taf Morgannwg) in relation to the provision of administrative and any other services to be provided to the Joint Committee.

**4. MEMBERSHIP**

The membership of the EASC in line with the Standing Orders comprises Chief Executives (or nominated deputies) from all health boards enabling the group to provide appropriate opportunities to make arrangements to fulfil the functions highlighted above.

The Chief Executives of NHS Trusts in Wales are associate members of the Committee. Chris Turner has been the Chair of the Committee for 2020-2021 and his term of appointment extended to 31 October 2021.

Steve Moore, Chief Executive of Hywel Dda University Health Board has been the Vice Chair since February 2019, a two-year appointment initially with an option to extend for a further two years (in line with the Standing Orders).

The Membership is attached as **Appendix 1**.

**5. ATTENDANCE AT MEETINGS**

The attendance of members and their nominated deputies has been good at Committee meetings with all meetings being quorate. However, for the second year, two associate members of the Committee have not attended a single meeting. The Members attendance is attached at **Appendix 2**.

**6. MAIN AREAS AND REPORTING LINES FOR EASC**

An agreed standard agenda format is used at meetings and the reporting mechanism to health boards includes forwarding the confirmed minutes to all health boards as well as a Chair’s summary of the latest meeting.. The Chair and Chief Ambulance Services Commissioner also attend all health board meetings on an annual basis to share the work of the Committee directly with board members.

The agenda and reports to all meetings can be found on the EASC Website: [Home - Emergency Ambulance Services Committee (nhs.wales)](https://easc.nhs.wales/) <https://easc.nhs.uk>

The standard agenda includes:

* Welcome and introduction
* Apologies for absence
* Declaration of interests
* Receive the unconfirmed minutes of the previous Committee meeting
* Action log
* Matters arising
* Chair’s Report
* Chief Ambulance Services Commissioner Report
* Finance Report
* Provider issues by exception
* EASC Governance including risk register
* Forward Plan of business

A summary of specific items received by the Committee are as follows:

**12 May 2020**

The meeting was curtailed to the Chief Ambulance Services Commissioner Report and the Welsh Ambulance Services NHS Trust provider update to reflect the operational pressures due to the Covid-19 pandemic.

CASC Report included:

* Year End Accounts
* Ministerial Ambulance Availability Task Force
* Annual Governance Statement
* Emergency Medical Retrieval and Transfer Service (EMRTS): commissioning framework
* Integrated Medium Term Plan
* Co-Chair a Task and Finish Group
* Ambulance Quality Indicators
* Meetings with WAST.

**14 July 2020**

* **‘Focus on’** Emergency Medical Retrieval and Transfer Service (EMRTS)
* EASC Annual Report 2019-2020
* EASC Annual Governance Statement 2019 -2020
* EMRTS Hosted Bodies Annual Report 2019-2020
* Non-Emergency Patient Transport Service (NEPTS) Annual Report and Terms of Reference 2019-2020
* EASC Management Group Annual Report and Terms of Reference 2019-2020
* CASC Report included:
* Year End Accounts and Annual Governance Statement
* Ministerial Ambulance Availability Task Force
* EASC Integrated Medium Term Plan
* Ambulance Quality Indicators
* Seasonal Planning
* Ambulance provision for the coming months
* Reviewing the Emergency Medical Services (EMS) Framework
* Meetings with WAST

**8 September 2020**

* **‘Focus on’ -** Non-Emergency Patient Transport Service (NEPTS)
* Outline Commissioning Intentions
* Unscheduled Care
* EASC IMTP Revised Delivery Plan
* Emergency Medical Retrieval and Transfer Service (EMRTS Cymru) Framework Agreement Final Draft
* CASC Report included:
* Ministerial Ambulance Availability Task Force
* Ambulance Quality Indicators
* Seasonal Planning
* Reviewing the Emergency Medical Services (EMS) Framework
* EASC Quality and Delivery Meeting with the Welsh Government
* Allocation letters for Major Trauma and Critical Care services
* Meetings with WAST

**10 November 2020**

* **‘Focus on’ -** System Pressures - planning and securing sufficient ambulance services for the population this winter
* CASC Report included:
* Ministerial Ambulance Availability Task Force
* Ambulance Quality Indicators (AQI)
* Seasonal Planning
* EASC Quality and Delivery Meeting with the Welsh Government
* Meetings with WAST
* Emergency Medical Retrieval and Transfer Service (EMRTS) Wales Update
* Progress with the transfer of Non-Emergency Patient Transport Services (NEPTS)
* Strategic Commissioning Intentions
* EASC Integrated Medium Term Plan (IMTP) updated key deliverables

**26 January 2021**

EASC meeting cancelled at the request of the Members due to the unprecedented operational pressures due to the second wave of the Covid-19 pandemic.

**9 March 2021**

* **‘Focus on’** – EASC Annual Plan and Commissioning Intentions
* Welsh Ambulance Services NHS Trust Integrated Medium Term Plan
* CASC report included:
* Ministerial Ambulance Availability Task Force
* Ambulance Quality Indicators (AQI)
* EASC Quality and Delivery Meeting with the Welsh Government
* Meetings with WAST
* Emergency Medical Retrieval and Transfer Service (EMRTS) Wales
* Non-Emergency Patient Transport Service
* National Unscheduled Care Board
* Unscheduled Care Dashboard
* Interim Emergency Medical Services Quality and Delivery Framework

**7. ACTION LOG**

In order to monitor progress and any necessary follow up action, the Committee has developed an Action Log that captures all agreed actions. This is an essential element of assurance to the EAS Committee and the Health Boards across NHS Wales.

**8. SUB GROUPS**

The Emergency Ambulance Services Committee has three sub-groups:

1. EASC Management Group
2. Emergency Medical Retrieval and Transfer Service Delivery Assurance Group
3. Non-Emergency Patient Transport Service Delivery Assurance Group

|  |  |  |
| --- | --- | --- |
| **EASC Management Group** | **Emergency Medical Retrieval and Transfer Service**  **Delivery Assurance Group** | **Non-Emergency Patient Transport Service**  **Delivery Assurance Group** |
| The overall purpose of the Management Group is to provide advice and make recommendations to EASC and to ensure that the seven LHBs in Wales will work jointly to exercise functions relating to the planning and securing of emergency ambulance services.  Ensure equitable access to safe, effective, sustainable and acceptable services for the people of Wales in line with agreed commissioning intentions and the EASC IMTP. | **EMRTS DAG**  Established to support the production, ongoing development and maintenance of the interim Framework.  Responsible for the delivery, direction and performance of the EMRTS. | **NEPTS DAG**  Established to support the production, ongoing development and maintenance of the interim Framework.  Responsible for the implementation of the NEPTS work programmes that deliver WHC 2007 (005) and the 2015 business case ‘The Future of NEPTS in Wales’. |
| Members include:   * Chaired by CASC representatives from Host Body * membership from health boards * Welsh Government representative * EASC Team * WAST Chief Executive * Representatives from WAST * Clinical representatives welcomed from health boards. | Members include:   * Chaired by CASC representatives from Host Body * membership from health boards * Welsh Government representative * EASC Team * EMRTS National director and service manager * WAST * Contract and Performance lead. | Members include:   * Chaired by a member of the EASC Team * EASC Team * NEPT Champion from every Health Board and Velindre NHS Trust * Director of Finance WHSSC representative from Welsh Renal Clinical Network and * Welsh Government. |

All Sub-Groups will develop an annual report for submission to the Committee for approval which in line with this report summarises the required functions and captures the work undertaken in 2020-2021.

**9. OTHER GOVERNANCE**

**Chief Ambulance Services Commissioner Quality and Delivery Meetings with the Welsh Ambulance Services NHS Trust**

Members will recall that that the Chief Ambulance Services Commissioner was asked by Welsh Government officials in December 2019 to hold the Quality and Delivery meetings with the Welsh Ambulance Services NHS Trust on their behalf. This change was made in line with the recommendations featured in the McClelland ‘Strategic Review of Emergency Ambulance Services’, and the Welsh Government were aiming to re-emphasise the need for simple governance and accountability for planning and delivery of emergency ambulance services. These meetings have continued during 2020-2021 although the meeting in March, April and September 2020 were cancelled due to operational pressures related to the Covid-19 pandemic.

**EASC Quality and Delivery Meeting**

Members will be aware that the CASC and the EASC Team have bi-monthly Quality and Delivery meetings with Welsh Government officials. Any issues arising from the WAST Quality and Delivery meeting are discussed with officials and EASC performance is reviewed. Updates from these meetings are included in the CASC report to the EAS Joint Committee.

**10. REVIEW OF THE GROUP’S EFFECTIVENESS**

The EAS Joint Committee aims to meet six times during the year with additional meetings being held as required. During 2020-2021 the Committee met 5 times, one meeting was cancelled due to the overwhelming pressure on the NHS of the Covid-19 pandemic. The role of the secretariat to the Committee is crucial to the ongoing development and maintenance of a strong governance framework for the EAS Committee.

The purpose of an effectiveness survey is to comply with the EASC Standing Orders and evaluate the performance and effectiveness of:

* the Committee
* the quality of the reports presented to the Committee
* the committee secretariat

Members of the Group need to consider the above by completion of a self-assessment questionnaire (**Appendix 3)** based the year 2020-2021.

|  |  |
| --- | --- |
|  |  |
| **Chris Turner** | **Stephen Harrhy** |
| **Chair of the Emergency Ambulance Services Joint Committee** | **Chief Ambulance Services Commissioner** |

**Date: 3 May 2021**

**Appendix 1**

**Emergency Ambulance Services Committee Members**

**and Nominated Deputies to March 2021**

| **Organisation** | **Name** | **Role** |
| --- | --- | --- |
| Emergency Ambulance Services Committee | Chris Turner | Chair (since November 2018) |
| Emergency Ambulance Services Committee | Stephen Harrhy | Chief Ambulance Services Commissioner |
| Chief Executive,  Aneurin Bevan UHB | Judith Paget | Member |
| Chief Executive,  Betsi Cadwaladr UHB | Simon Dean  (Interim CEO) | Member (from March 2020 to September 2020) |
| Gill Harris | Member (September 2020 to January 2021) |
| Jo Whitehead | Member from January 2021 |
| Chief Executive,  Cardiff & Vale UHB | Len Richards | Member |
| Chief Executive,  Cwm Taf Morgannwg UHB | Sharon Hopkins  (Interim CEO) | Member (from September 2019 to August 2020) |
| Paul Mears | From September 2020 |
| Chief Executive,  Hywel Dda UHB | Steve Moore | Member (Vice Chair) |
| Chief Executive,  Powys Teaching HB | Carol Shillabeer | Member |
| Chief Executive,  Swansea Bay UHB | Tracy Myhill | Member to December 2020 |
| Mark Hackett | Member from January 2021 |
| Chief Executive, Welsh  Ambulance Services NHS Trust | Jason Killens | Associate Member |
| Chief Executive, Public Health Wales NHS Trust | Tracey Cooper | Associate Member |
| Chief Executive,  Velindre NHS Trust | Steve Ham | Associate Member |

(University Health Board (UHB))

**Appendix 2**

**Annual Attendance Register - Joint Committee Meeting**

|  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **University Health Board (UHB)** | **May**  **2020** | **Jul**  **2020** | | **Sept**  **2020** | | **Nov**  **2020** | | **Jan 2021**  **cancelled** | **Mar 2021** |
| **Committee Members and nominated Executives (√)** | | | | | | | | |  |
| Chair | √ | | √ | | √ | | √ |  | √ |
| CASC | √ | | √ | | √ | | √ | √ |
| Aneurin Bevan UHB | √ | | √ | | √ | | √ | √\* |
| Swansea Bay UHB | √ | | Apls | | √\*\* | | √\*\* | √\* |
| Betsi Cadwaladr UHB | √ | | √ | | √ | | √\*\* | √ |
| Cardiff & Vale UHB | Apls | | √ | | √\* | | Apls | √ |
| Cwm Taf Morgannwg UHB | √\* | | √\* | | √\* | | √\* | √ |
| Hywel Dda UHB | √ | | √ | | Apls | | Apls | Apls |
| Powys Teaching HB | √ | | √ | | √ | | √ | √\* |
| **Associate Committee Members** | | | | | | | |  |
| WAST | √ | | √ | | √ | | √ | √ |
| Public Health Wales | x | | x | | x | | x | X |
| Velindre NHS Trust | x | | x | | √\* | | √\* | x |

X \* denotes CEO not present but the nominated Executive Director present

X \*\* denotes CEO not present but sent a representative (not nominated deputy)

January 2021 meeting cancelled due to operational pressures related to the Covid-19 pandemic second wave

**Appendix 3**



**EFFECTIVENESS SURVEY**

**EAS JOINT COMMITTEE**

The primary purpose of this annual self-assessment survey is to consider the effectiveness of the Committee. The survey is based on a committee effectiveness survey template used for all Board Sub-Committees and members are requested to answer all questions.

Please read the question fully and add a **“√”** in the relevant box to confirm your response**.**

|  |
| --- |
| **Part A (The Committee)** |
| **Composition and Establishment** |

|  | **Yes (√)** | **No (√)** | **Don’t Know (√)** | **Comments** |
| --- | --- | --- | --- | --- |
| 1. Does the Committee have written terms of reference that adequately and accurately define its role, purpose and accountabilities? |  | **√** |  | EASC Directions 2014  EASC Regulations 2014  Explanatory memorandum for EASC Directions |
| 1. Have the terms of reference been adopted by the Committee? |  | **√** |  | Not applicable |
| 1. Are the terms of reference reviewed annually to ensure they remain fit for purpose? |  | **√** |  |  |
| 1. Does the Committee have an annual work plan in place?   If yes, is it reviewed regularly? | **√** |  |  | Forward plan |
|  |  |  | At each meeting |
| 1. Has the Committee been provided with sufficient membership, authority and resources to perform its role effectively and objectively? | **√** |  |  |  |
| 1. Does the Committee monitor its attendance? | **√** |  |  | Within the Annual Report |
| 1. Is the Committee membership appropriate, in terms of available skills, expertise?   If no, please elaborate within comments section. |  |  |  |  |
| **Effective Functioning – Committee** | | | | |
| 1. Is there effective challenge, scrutiny and learning lessons from all Members? |  |  |  |  |
| 1. Do the Health Boards review the progress and outputs of the Committee? |  |  |  |  |
| 1. Does the Committee report regularly to health boards and through action notes and make clear recommendations when necessary? | **√** |  |  | All confirmed minutes and a Chair’s summary are sent to all health boards following Committee meetings |
| 1. Does the Committee periodically assess its own effectiveness? | **√** |  |  |  |
| 1. Can members give appropriate feedback on the effectiveness of the Chair and the Secretariat? | **√** |  |  |  |
| 1. Has the Committee determined the appropriate level of detail it wishes to receive from reports? |  | **√** |  |  |
| 1. Does the Committee receive the appropriate level of timely and accurate information to allow it to fulfil its role? |  |  |  |  |
| 1. Does the Committee have sufficient time to cover its business? | **√** |  |  |  |
| 1. Does the Committee effectively monitor – or ensure monitoring of - agreed actions? | **√** |  |  | Action log and forward look at all meetings |
| 1. Are members particularly those new to the Committee, provided with training? |  | **√** |  |  |
| 1. Has the Committee formally considered how it integrates with other groups and meetings? |  | **√** |  |  |
| 1. Where they exist, does the Committee receive timely and appropriate feedback from its sub-groups ? | **√** |  |  | Minutes of all sub groups received at meetings for approval |
| 1. Does the Committee provide clear direction to its sub-groups? | **√** |  |  |  |
| 1. Does the Committee produce an Annual Report of its work? | **√** |  |  | This is the second one |
| 1. If yes (to Q 22) - Do all members contribute to and review the Groups Annual Report? | **√** |  |  |  |
| **Compliance with the law and regulations governing the NHS** | | | | |
| 1. Does the Committee have a mechanism to keep it aware of topical issues? | **√** |  |  | Focus on sessions  Forward look and CASC Report |
| 1. Does the Committee have a mechanism to keep it aware of any related legal / regulatory guidance? | **√** |  |  | Committee Secretary member of Board Secretary peer group |
| **Assurance** | | | | |
| 1. Does the Committee receive timely exception reports about the work of external regulatory and inspection bodies? | **√** |  |  |  |
| 1. Does the Committee receive timely information   on performance concerns? | **√** |  |  |  |
| 1. Are all reports clear, concise, and readily understood? | **√** |  |  |  |
| 1. Is the Committee able to refer matters outside its own jurisdiction and if yes, is any feedback reviewed on such matters? | **√** |  |  | Link to national groups e.g. Primary Care Board; Urgent and Emergency Care Board; peer groups etc |
| 1. If considered appropriate, does the Committee know the process to be followed should it need to escalate matters? | **√** |  |  |  |
| 1. In relation to the Risk Register, does the Committee appropriately review the risks assigned to it? | **√** |  |  | Each meeting |
| **Other Issues** | | | | |
| 1. Does the Committee meet the appropriate   number of times to deal with planned matters,  development and liaison? | **√** |  |  | **6 times a year** |
| 1. Are arrangements in place to call ad hoc   meetings when necessary? | **√** |  |  | In line with Standing Orders approved in March 2021 |
| 1. Are Committee members notified of urgent matters when appropriate? | **√** |  |  |  |
| 1. Does the Committee make the EASC Team aware of issues of staff capacity and skills that   impact on the running of the committee? |  |  |  |  |
| **Administrative arrangements** | | | | |
| 1. Are the Committee’s costs appropriate to the perceived risks and benefits? | **√** |  |  |  |
| 1. Are papers circulated in good time and are minutes and agreed actions, received as soon as possible after meetings? |  |  |  |  |
| **Questions for Consideration & Discussion** | | | | |
| 1. Does the Committee ensure that its work is fully conveyed to wider organisations? |  |  |  |  |
| 1. Is the work of the Committee’s duplicated elsewhere? if yes, please elaborate. |  | **√** |  |  |
| 1. Do you consider the Committee to be effective in discharging its duties in line with the legislation? |  |  |  |  |
| 1. Do you have any suggestions on how the work of the Committee could be improved or strengthened? |  |  |  |  |
| **PART B - Effective Functioning - individual members** | | | | |
| 1. What is your role on the Group?    1. Member    2. Designated deputy for the health board    3. WAST CEO    4. Representative from WAST    5. Representative of other NHS Trust    6. EASC Team  * Other |  |  |  |  |
| 1. Do I have sufficient understanding and   knowledge of the issues covered within the legal directors of the Committee? |  |  |  |  |
| 1. Do I appropriately challenge the Chair and other members of the group particularly on critical and sensitive matters? |  |  |  |  |

**Thank you for taking the time to complete this questionnaire. Please return completed forms to Gwenan Roberts**

[**Gwenan.roberts@wales.nhs.uk**](mailto:Gwenan.roberts@wales.nhs.uk)

1. The Emergency Ambulance Services Committee (EASC) (Wales) Regulations 2014 (SI 2014 No.566 (W.67)<http://www.wales.nhs.uk/sitesplus/documents/1134/Welsh%20Statutory%20Instrument%20for%20EASC%202014%20No%20566%20%28w67%29.pdf> [↑](#footnote-ref-1)
2. the EASC (Wales) (Amendment) Directions 2016 No.8 (W.8) <http://www.wales.nhs.uk/sitesplus/documents/1134/2016%20No%208%20%28W8%29%20The%20EASC%20%28Wales%29%20%28Amendment%29%20Directions%202016.pdf> [↑](#footnote-ref-2)