

**The aim of the Care Act 2014 was to “transform the system of care and support in England for the good of each and every one of us” (‘Caring for our future: reforming care and support’ White Paper, July 2012). To what extent has the Act achieved these aims?**

The Care Act 2014 (CA) was a major reform in adult social care law; it consolidated the prior complex legislation—which was described in case law as “labyrinthine”,<sup>1</sup> “piecemeal ... numerous”,<sup>2</sup> “exceptionally tortuous”,<sup>3</sup> with some of the “worst drafted” secondary legislation<sup>4</sup>—into a single statute.<sup>5</sup> The CA’s strengths include increased personalisation by avoiding a service-led model,<sup>6</sup> greater focus on strengths-based approaches and community assets,<sup>7</sup> and putting personal budgets on a statutory footing.<sup>8</sup> Nonetheless, it also has notable flaws, which this essay will explore, including issues with resource distribution, providing clear definitions, support for carers, and adult safeguarding.

Unlike health care, social care is not a free, universal service<sup>9</sup> and local authorities can charge service users for meeting needs,<sup>10</sup> without a cap on contributions.<sup>11</sup> However, this does not mean that adult social care is inexpensive, as service users’ liability to pay is subject to a means-test<sup>12</sup> and the local authority is obligated to carry out a needs assessment regardless of financial need.<sup>13</sup> In 2022/2023 approximately 77% of people using community care services were state funded<sup>14</sup> and total expenditure on adult social care was £28.4 billion.<sup>15</sup> Despite

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<sup>1</sup> *Crofton v NHS Litigation Authority* [2007] EWCA Civ 71 [111].

<sup>2</sup> *A v London Borough of Lambeth* [2001] EWHC Admin 376 [24] (Scott Baker LJ).

<sup>3</sup> *R (F) v Wirral Borough Council* [2009] EWHC 1626 (Admin) [8] (McCombe J).

<sup>4</sup> *Ryan v Liverpool Health Authority* [2001] All ER (D) 15 [5] (Munby LJ).

<sup>5</sup> Law Commission, *Adult Social Care* (Law Com No 326, 2011), para 1.1.

<sup>6</sup> Deb Barnes and others, ‘Personalisation and social care assessment – the Care Act 2014’ (2018) 41(3) *BJPsych Bulletin* <<https://www.cambridge.org/core/journals/bjpsych-bulletin/article/personalisation-and-social-care-assessment-the-care-act-2014/ADE7C621B17CFB09E8D3B01E024FF8E1>> accessed 28 October 2024.

<sup>7</sup> Lyn Romeo and Tony Hunter, ‘Strengths-based Social Work Practice with Adults: Roundtable Report’ (*Department of Health*, 21 July 2017) <[https://assets.publishing.service.gov.uk/media/5a82e25040f0b62305b94d9f/Strengths-based\\_social\\_work\\_practice\\_with\\_adults.pdf](https://assets.publishing.service.gov.uk/media/5a82e25040f0b62305b94d9f/Strengths-based_social_work_practice_with_adults.pdf)> accessed 28 October 2024.

<sup>8</sup> Care Act 2014, s 26; Care and Support (Direct Payments) Regulations 2014, SI 2014/2871.

<sup>9</sup> Tim Spencer-Lane, ‘Overview of the Care Act 2014’ in Suzy Braye and Michael Preston-Shoot (eds), *The Care Act 2014: Wellbeing in Practice* (SAGE 2020), p 17.

<sup>10</sup> Care Act 2014, s 14.

<sup>11</sup> A power to introduce a cap on care costs is contained in the Care Act 2014, s 15, but current government has abandoned plans to introduce this cap; Mithran Samuel, ‘Government scraps cap on care costs to help tackle spending “black hole”’ (*Community Care*, 29 July 2024) <<https://www.communitycare.co.uk/2024/07/29/government-scraps-cap-on-care-costs-to-help-tackle-22bn-public-spending-black-hole/>> accessed 28 October 2024.

<sup>12</sup> Care and Support (Charging and Assessment of Resources) Regulations 2014, SI 2014/2672.

<sup>13</sup> Care Act 2014, s 9.

<sup>14</sup> Office for National Statistics, ‘Estimating the size of the self-funding population in the community, England: 2022 to 2023’ (*Statistical Bulletin*, 26 July 2023) <<https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/bulletins/estimatingthesizeoftheselffunderpopulationinthecommunityengland/2022to2023>> accessed 28 October 2024.

<sup>15</sup> King’s Fund, ‘Social care 360: expenditure’ (*Health and Care Services*, 13 March 2024) <<https://www.kingsfund.org.uk/insight-and-analysis/long-reads/social-care-360-expenditure>> accessed 28 October 2024.

budgetary increases, adult social care remains persistently underfunded with local authorities looking to cut costs.<sup>16</sup> The allocation of limited resources has been a significant issue in implementing the CA's objectives,<sup>17</sup> but the Care Act does not directly address resource distribution.

One primary issue the CA sort to rectify was unequal access to care. The White Paper stated it is 'unfair that access to this support varies significantly across the country'.<sup>18</sup> The introduction of a national eligibility criteria<sup>19</sup> focused on wellbeing was intended to eliminate this unequal entitlement based on location. Despite this, the 'postcode lottery' remains a widespread problem, with rates of refusal varying from 85% to 12% in different local authorities,<sup>20</sup> suggesting the eligibility criteria are not applied uniformly. The government arguably failed to accurately identify the cause of the postcode lottery. Prior to the CA, the Fair Access to Care Services policy<sup>21</sup> allowed councils to choose which of four priority bands of care it could afford, which the government claimed caused the disparity in access.<sup>22</sup> However, the Audit Commission found that spending differences between councils were not linked to the number of bands made eligible,<sup>23</sup> and the Department of Health's impact assessment found that the three councils selecting only the 'critical band' provided equal or greater support than others.<sup>24</sup>

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<sup>16</sup> Mithran Samuel, "'Worst financial outlook for years" for adult social care revealed by directors' survey' (*Community Care*, 16 July 2024) <<https://www.communitycare.co.uk/2024/07/16/worst-financial-outlook-for-years-for-adult-social-care-revealed-by-directors-survey/>> accessed 28 October 2024; George Stevenson, 'Social care funding: Three key questions about funding in England' (*Health Foundation*, 4 September 2024) <<https://www.health.org.uk/publications/long-reads/social-care-funding>> accessed 28 October 2024.

<sup>17</sup> Colin Whittington, 'The Promised Liberation of Adult Social Work under England's 2014 Care Act: Genuine Prospect or False Prospectus?' (2016) 46(7) *British Journal of Social Work*, p 1957 <<https://www.jstor.org/stable/26363600>> accessed 28 October 2024; Colin Whittington, 'Another Step towards the Promised Liberation of Adult Social Work under England's 2014 Care Act? The Implications of Revised Statutory Guidance and the Politics of Liberation' (2016) 46(7) *British Journal of Social Work*, p 1976 <<https://www.jstor.org/stable/26363601>> accessed 28 October 2024.

<sup>18</sup> Department of Health, *Caring for our future: reforming care and support* (Cm 8378, 2012), p 16.

<sup>19</sup> Care Act 2014, s 13; Care and Support (Eligibility Criteria) Regulations 2015, SI 2015/313, reg 2.

<sup>20</sup> Care and Support Alliance, 'New CSA analysis reveals the massive postcode lottery for care facing the public today' (*News Story*, 23 July 2024) <<https://careandsupportalliance.com/new-analysis-reveals-postcode-lottery-for-care/>> accessed 28 October 2024.

<sup>21</sup> Department of Health, 'Fair access to care services - guidance on eligibility criteria for adult social care, LAC (2002)13' (*National Archives*, 1 January 2003) <[https://webarchive.nationalarchives.gov.uk/ukgwa/20080818004700/http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH\\_4009653](https://webarchive.nationalarchives.gov.uk/ukgwa/20080818004700/http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_4009653)> accessed 28 October 2024.

<sup>22</sup> Peter Beresford and Colin Slasberg, 'The Care Act: the service user's experience' in Suzy Braye and Michael Preston-Shoot (eds), *The Care Act 2014: Wellbeing in Practice* (SAGE 2020), p 45.

<sup>23</sup> Audit Commission, 'The Effect of Fair Access to Care Services Bands on Expenditure and Service Provision' (Commission for Social Care Inspection 2008).

<sup>24</sup> All the other councils had made the 'critical' and 'substantial' band only eligible. Department of Health, 'The Care Act 2014: Regulations and guidance for implementation of Part 1 of the Act in 2015/16' (*Impact Assessment*, 20 October 2014), para 2.45 <[https://www.legislation.gov.uk/ukia/2014/407/pdfs/ukia\\_20140407\\_en.pdf](https://www.legislation.gov.uk/ukia/2014/407/pdfs/ukia_20140407_en.pdf)> accessed 28 October 2024.

Thus, the introduction of a national eligibility criteria did little to attenuate the postcode lottery, as it did not address the main reason for differing eligibility decisions—variations in resources.<sup>25</sup> Additionally, national funding regulations allow local authorities some discretion in determining which sums should be disregarded.<sup>26</sup> This enables different authorities to apply varying funding criteria based on their resources, which the CA aimed to prevent. This is reflected in judicial review decisions where the High Court ruled in *R (SH) v Norfolk CC*<sup>27</sup> that the council’s funding policy was unlawful for indirectly discriminating<sup>28</sup> against disabled people unable to work by allowing their benefits to be used for care costs, but a similar claim in *R (YVR) v Birmingham CC*<sup>29</sup>, regarding a harsher policy, was unsuccessful as the council’s dire financial position justified the extreme measure. It would have been better for the CA to directly address the issue of resources by incorporating the affordability of need into the assessment process.<sup>30</sup> Rather than the tacit adapting of eligibility criteria to meet resources, greater transparency would allow inadequate funding to be more easily identified.

Another way the CA enables inconsistent care provision is through its vague definition of wellbeing. Promoting wellbeing is a foundational duty in the CA, but instead of a direct definition, the CA provides a non-exhaustive list of nine imprecise aspects (e.g., ‘social and economic well-being’).<sup>31</sup> The statutory guidance acknowledges that this as a ‘broad concept’ with ‘no hierarchy’ between aspects.<sup>32</sup> While this flexible view of wellbeing enables case-based professional judgment,<sup>33</sup> it can also be manipulated to turn wellbeing assessments into veiled affordability determinations. This risk is difficult to mitigate through judicial review as the malleability of the wellbeing assessment makes it difficult to satisfy the *Wednesbury*<sup>34</sup> test (that a decision is ‘so unreasonable that no reasonable authority could ever have come to it’). Judicial

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<sup>25</sup> Jill Russell and others, ‘Addressing the “postcode lottery” in local resource allocation decisions: a framework for clinical commissioning groups’ (2013) 106(4) *Journal of the Royal Society of Medicine* <<https://journals.sagepub.com/doi/10.1177/0141076813479192>> accessed 28 October 2024; Colin Slasberg, ‘Care Act funding decision exposes the nonsense of eligibility criteria’ (*Community Care*, 16 June 2017) <<https://www.communitycare.co.uk/2017/06/16/care-act-funding-decision-exposes-nonsense-eligibility-criteria/>> accessed 28 October 2024.

<sup>26</sup> Care and Support (Charging and Assessment of Resources) Regulations 2014, SI 2014/2672, reg 15(2).

<sup>27</sup> *R (SH) v Norfolk County Council* [2020] EWHC 3436 (Admin).

<sup>28</sup> The policy was found to breach the public sector equality duty under the Equality Act 2010, s 149 and the Human Rights Act 1998 (specifically Article 1 of the first Protocol (enjoyment of possessions) read with Article 14 (prohibition of discrimination) of the European Convention on Human Rights).

<sup>29</sup> *R (YVR) v Birmingham City Council* [2024] EWHC 701 (Admin).

<sup>30</sup> Peter Beresford and Colin Slasberg, ‘The Care Act: the service user’s experience’ in Suzy Braye and Michael Preston-Shoot (eds), *The Care Act 2014: Wellbeing in Practice* (SAGE 2020), p 47.

<sup>31</sup> Care 2014, s 1.

<sup>32</sup> Department of Health and Social Care, ‘Care and support statutory guidance’ (*Statutory Guidance*, 27 September 2024), para 1.5-6 <<https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance>> accessed 28 October 2024.

<sup>33</sup> Pete Feldon, *The Social Worker’s Guide to the Care Act 2014* (2nd edn, Critical Publishing 2023).

<sup>34</sup> *Associated Provincial Picture Houses Ltd v Wednesbury Corpn* [1947] EWCA Civ 1 [6] (Lord Greene MR).

review remains the only legally binding mechanism for challenging local authority decisions, as the CA's power to introduce an appeal mechanism<sup>35</sup> has not been exercised.<sup>36</sup>

Successful actions for judicial review tend to relate to procedural failings in assessments, such as improper reliance on a provider's assessment rather than the local authority conducting its own assessment (*R (JF) v LBM*),<sup>37</sup> failing to pay for recognised eligible past support (*R (CP) v NELC*),<sup>38</sup> and failing to provide an independent advocate to a non-English-speaking, illiterate asylum seeker (*R (SG) v LBH*).<sup>39</sup> Challenges of the substantive merits of council decisions, like the weighting of different factors, are generally less successful. For instance, in *R (Davey) v OCC*<sup>40</sup> the claimant unsuccessfully challenged a reduction in his personal budget. The Court of Appeal upheld the council's assessment that his independence was an eligible need, improved by spending more time alone, despite this being against his wishes. Similarly, in *R (McDonald) v RBKC*<sup>41</sup> the Supreme Court upheld the council's decision to fund incontinence pads rather than a more expensive night-carer to meet the claimant's toileting need. Although the claimant (who was not incontinent) found this an 'intolerable affront to her dignity',<sup>42</sup> but the court held the council could rely on its own assessment that pads offered greater independence and privacy, considering the impact of costs on other service users. These cases illustrate the wide discretion authorities have in determining eligible needs and, in this respect, there has been little appreciable change from the pre-CA judgments which accepted that authorities could consider financial resources in assessing eligible needs.<sup>43</sup>

Another key objective of the CA was to improve support for carers, who are now entitled to an assessment in their own right<sup>44</sup> and support if their caring responsibilities significantly affect their wellbeing.<sup>45</sup> This support operates alongside existing aid (e.g. Carers' Allowance).<sup>46</sup> Dame Philippa Russell described this changes as a 'quiet revolution', saying it would bring carers

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<sup>35</sup> Care Act 2014, s 72.

<sup>36</sup> Department of Health and Social Care, *People at the Heart of Care: adult social care reform* (Cm 560, 2022). A challenge to this decision based on a failure to conduct a public consultation was unsuccessful: *R (HL) v Secretary of State for Health and Social Care* [2023] EWHC 866 (Admin).

<sup>37</sup> *R (JF) v The London Borough of Merton* [2017] EWHC 1519 (Admin).

<sup>38</sup> *R (CP) v North East Lincolnshire Council* [2019] EWCA Civ 1614.

<sup>39</sup> *R (SG) (a protected party by her litigation friend the Official Solicitor) v London Borough of Haringey* [2015] EWHC 2579 (Admin).

<sup>40</sup> *R (Davey) v Oxfordshire County Council (Equality and Human Rights Commission intervening)* [2017] EWCA Civ 1308.

<sup>41</sup> *R (McDonald) v Royal Borough of Kensington and Chelsea* [2011] UKSC 33.

<sup>42</sup> *ibid* [1] (Lord Brown).

<sup>43</sup> *R (KM) (by his mother and litigation friend JM) (FC) v Cambridgeshire County Council* [2012] UKSC 23; *R v Gloucestershire County Council, Ex parte Barry* [1997] AC 584; *R (D) v Worcestershire County Council* [2013] EWHC 2490 (Admin).

<sup>44</sup> Care Act 2014, s 10.

<sup>45</sup> Care and Support (Eligibility Criteria) Regulations 2015, SI 2015/313, reg 3.

<sup>46</sup> Social Security (Invalid Care Allowance) Regulations 1976, SI 1976/409.

‘recognition, respect and parity of esteem with those they support’.<sup>47</sup> However, after the Act’s implementation, fairly minimal changes were reported in practice.<sup>48</sup> Cost-saving efforts underlie many complaints investigated by the Local Government and Social Care Ombudsman such as *Wiltshire Council’s*<sup>49</sup> refusal to fund carers’ needs above a maximum budget levels and *Kent County Council’s*<sup>50</sup> denial of payments to carers who also worked. Overall, resources remain an impediment to the CA’s transformative ambitions for carers.<sup>51</sup>

Another salient feature of the CA is that it embedded adult safeguarding in primary legislation, establishing the local authority’s duty to inquire if a person with care needs is suspected to be experiencing abuse or neglect, and defining the functions of Safeguarding Adult Boards (SABs).<sup>52</sup> These changes are largely positive,<sup>53</sup> but there are limitations in the statute which affect the safeguarding process’s effectiveness. As with wellbeing, the terms abuse and neglect are undefined,<sup>54</sup> with only illustrative examples (e.g., ‘psychological’ and ‘organisational’ abuse) given in the statutory guidance.<sup>55</sup> This can lead to poor legal literacy amongst practitioners, resulting in serious failures in the conduct of safeguarding investigations.<sup>56</sup> Abuse can also be inconsistently interpreted,<sup>57</sup> as suggested by the variability in Safeguarding Adult Review frequency among SABs.

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<sup>47</sup> Department of Health, ‘The Care Act – the law for carers’ (*Factsheet 8*, 2013), p 1 <[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/321310/Factsheet\\_8.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/321310/Factsheet_8.pdf)> accessed 28 October 2024.

<sup>48</sup> Carers Trust, ‘Care Act for carers: One year on’ (*Research*, 2016) <<https://carers.org/downloads/resources-pdfs/care-act/care-act-for-carers-one-year-on.pdf>> accessed 28 October 2024; Jose-Luis Fernandez and others, ‘Supporting Carers Following the Implementation of the Care Act 2014: Eligibility, Support and Prevention’ (*Carers in Adult Social Care study*, 2020 <<https://www.lse.ac.uk/cpec/assets/documents/cascfinalreport.pdf>> accessed 28 October 2024; Jill Manthorpe and others, ‘Carers and the Care Act: promise and potential’ in Suzy Braye and Michael Preston-Shoot (eds), *The Care Act 2014: Wellbeing in Practice* (SAGE 2020), p 58.

<sup>49</sup> *Wiltshire Council* (16 015 946) (Local Government and Social Care Ombudsman, 12 April 2018) <<https://www.lgo.org.uk/decisions/adult-care-services/assessment-and-care-plan/16-015-946>> accessed 28 October 2024.

<sup>50</sup> *Kent County Council* (14 015 230) (Local Government and Social Care Ombudsman, 7 June 2016) <<https://www.lgo.org.uk/decisions/children-s-care-services/disabled-children/14-015-230>> accessed 28 October 2024.

<sup>51</sup> Local Government Association, ‘The Care Act 2014: Ten years on from Royal Assent’ (*Adult social care*, 14 May 2024) <<https://www.local.gov.uk/publications/care-act-2014-ten-years-royal-assent>> accessed 28 October 2024.

<sup>52</sup> Care Act 2014, s 42-44.

<sup>53</sup> Lyn Romeo, ‘Social work and safeguarding adults (2015) 17(3) *Journal of Adult Protection* <<https://doi.org/10.1108/JAP-03-2015-0008>> accessed 28 October 2024; Adi Cooper and Claire Bruin, ‘Adult safeguarding and the Care Act (2014) – the impacts on partnerships and practice’ (2017) 19(4) *Journal of Adult Protection* <<https://doi.org/10.1108/JAP-03-2017-0009>> accessed 28 October 2024.

<sup>54</sup> Jonathan Herring, *Vulnerable Adults and the Law* (Cambridge University Press 2016), p 174.

<sup>55</sup> Department of Health and Social Care, ‘Care and support statutory guidance’ (*Statutory Guidance*, 27 September 2024), para 14.7 <<https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance>> accessed 28 October 2024.

<sup>56</sup> e.g. *Somerset County Council v MK* [2014] EWCOP B25; *Milton Keynes Council v PR* [2014] [2014] EWCOP B19.

<sup>57</sup> Suzy Braye and Micheal Preston-Shoot, ‘Adult safeguarding’ in Suzy Braye and Michael Preston-Shoot (eds), *The Care Act 2014: Wellbeing in Practice* (SAGE 2020), p 90;

Additionally, it is questionable whether SABs are fully independent, as most members are representatives of the organisations they are tasked with holding accountable.<sup>58</sup> SAB's exemption from freedom of information requests increases this concern as scrutiny is hindered.<sup>59</sup> SABs can also struggle to obtain the information required to carry out its functions effectively.<sup>60</sup> Despite the statutory duty to comply with such requests,<sup>61</sup> SABs have limited recourse, aside from reporting to regulators or lengthy and expensive judicial reviews, in the event of non-compliance.

A controversial change made by the CA was the repeal of the power to remove adults from their home in specified circumstances<sup>62</sup> as the government regarded powers under other legislation as sufficient.<sup>63</sup> A power of removal seems unnecessary, but a limited power of entry to speak with an adult at risk would have been a useful addition<sup>64</sup> considering the problems that can arise when access is obstructed by third parties<sup>65</sup> (similar powers already exist in Scotland and Wales).<sup>66</sup>

In conclusion, the CA has arguably not been able to fully achieve its laudable objectives as the care and support cannot be said to have been transformed for 'the good of each and every one of us' whilst there remains pronounced disparity in ability to access support and persistent difficulties in ensuring the proper safeguarding of adults. It is unsurprising that the CA hasn't met its ambitious aims since it is unrealistic to expect a single statute to be a panacea that resolves all adult social care issues and ensure appropriate care for everyone. Legal

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<sup>58</sup> Suzy Braye and Micheal Preston-Shoot, 'Adult safeguarding' in Suzy Braye and Michael Preston-Shoot (eds), *The Care Act 2014: Wellbeing in Practice* (SAGE 2020), p 88.

<sup>59</sup> It is not listed in the Freedom of Information Act 2000, sch 1; *McClatchey v The Information Commissioner and South Gloucestershire District Council* [2016] UKFTT 2014\_0252 (GRC).

<sup>60</sup> Suzy Braye and Michael Preston-Shoot, 'Learning from SARs: A report for the London Safeguarding Adults Board' (*London Safeguarding Adults Board*, 18 July 2017) <<https://www.surreysab.org.uk/wp-content/uploads/2020/09/Learning-from-SARs-A-report-for-the-London-Safeguarding-Adults-Board.pdf>> accessed 28 October 2024.

<sup>61</sup> Care Act 2014, s 45.

<sup>62</sup> Care Act 2014, s 46 which repealed the National Assistance Act 1948, s 47.

<sup>63</sup> The powers in questions are contained in: Mental Health Act 1983, s 135; Police and Criminal Evidence Act 1984, s 17; Crime and Security Act 2010, s 24-29; Mental Capacity Act 2005, s 5, 6 and 44.

<sup>64</sup> Micael Preston-Shoot and Sally Cornish, 'Paternalism or proportionality? experiences and outcomes of the Adult Support and Protection (Scotland) Act 2007' (2014) 16(1) *Journal of Adult Protection* <<https://uobrep.openrepository.com/handle/10547/333889>> accessed 28 October 2024; Martin Stevens and others, 'Social workers' power of entry in adult safeguarding concerns: debates over autonomy, privacy and protection' (2017) 19(6) *Journal of Adult Protection* <<https://doi.org/10.1108/JAP-04-2017-0020>> accessed 28 October 2024.

<sup>65</sup> Martin John Stevens and others, 'Helping or Hindering in Adult Safeguarding: an investigation of practice' (Social Care Workforce Research Unit, 15 August 2017) <<https://kclpure.kcl.ac.uk/portal/en/publications/helping-or-hindering-in-adult-safeguarding-an-investigation-of-pr>> accessed 28 October 2024; Michael Preston-Shoot, 'On self-neglect and safeguarding adult reviews: diminishing returns or adding value?' (2017) 19(2) *Journal of Adult Protection* <<https://uobrep.openrepository.com/handle/10547/622023>> accessed 28 October 2024.

<sup>66</sup> Adult Support and Protection (Scotland) Act 2007 (asp 10), s 37; Social Services and Well-being (Wales) Act 2014 (anaw 4), s 161.

improvements require continual refinement and, while the CA was a step in the right direction, further reforms would help continue the journey to realising its ambitions.

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