

Consultation Questionnaire

Draft Statutory Guidance on Care and Support

Consultation Questions

Section 2: (Values and Principles) The Supported Persons Pathway

**Question 1a: Was this section of the guidance clear and easy to understand?
(please tick)**

Yes

Yes	No
<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Question 1b: How useful did you find this section of the guidance?
(please tick)**

Very useful

Very useful	Quite Useful	Not very useful	Not at all useful
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Question 1c: Do you have any further comments on this section of the guidance?

Some advice to help you to answer this question – Please provide your suggestions for improvements or additions to this section. Are there any further topics that you would like to see included, any changes that should be made or any other comments you'd like to make?

Angus Council agrees that a change in language is required to support the shift in culture that needs to be delivered through the implementation of the Act. It appears that there is a move away from the term care management although this is the process described in the regulations. We would agree that this is a positive step that will go some way towards delivering a new cultural of assessment based on co-production. We would suggest that the 'person's support plan' should be referred to more simply as the 'person's plan'. This would assist with the shift away from inputs and process to a focus on outcomes.

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Consultation Questions

Section 3: Values and Principles

**Question 2a: Was this section of the guidance clear and easy to understand?
(please tick)**

Yes

Yes	No
<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Question 2b: How useful did you find this section of the guidance?
(please tick)**

Very useful

Very useful	Quite Useful	Not very useful	Not at all useful
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Question 2c: Do you have any further comments on this section of the guidance?

Some advice to help you to answer this question – Please provide your suggestions for improvements or additions to this section. Are there any further topics that you would like to see included, any changes that should be made or any other comments you'd like to make?

Angus Council agrees with the SDS statement of values and principles as those that underpin good social work practice and reflect themes such as public participation and citizenship.

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Consultation Questions

Section 4: Eligibility and Assessment

**Question 3a: Was this section of the guidance clear and easy to understand?
(please tick)**

Yes

Yes	No
<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Question 3b: How useful did you find this section of the guidance?
(please tick)**

Quite useful

Very useful	Quite Useful	Not very useful	Not at all useful
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Question 3c: Do you have any further comments on this section of the guidance?

Some advice to help you to answer this question – Please provide your suggestions for improvements or additions to this section. Are there any further topics that you would like to see included, any changes that should be made or any other comments you'd like to make?

We would argue that assessment needs to be holistic and it needs to consider a person's wider world not just those immediate presenting needs. Angus Council would suggest that there is something to learn from the 'my world triangle' approach developed through GIRFEC. Such an approach for adults could perhaps steer people away from 'entitlement' to local authority support particularly where the level of risk would mean that they may be ineligible for social work support depending on the local authority's priority settings.

In terms of eligibility criteria Angus Council would wish to see greater detail in the definitions and some practical examples of how an approach based on risk management can be used in an environment where risk enablement is being promoted. In terms of the descriptions themselves it would be helpful to continue to address language issues and move away from terms such as 'the provision of social care services'.

We would also suggest that this section could be strengthened by a definition of outcomes with case examples. Outcomes should be SMART which would mean that an individual's outcome may change over time. The role of reviews in exploring how outcomes are being met and ensuring that any needs also continue to be met would also benefit from focus within this section. Professionals are concerned that loss of control will lead to vulnerable adults being at greater risk of abuse, but with a well developed approach to review this will not be the case. It would be helpful if paragraphs 62 to 66 also explored a professionals 'duty of care' in respect of safeguarding issues.

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Section 5 : Support Planning

This section of the guidance covered:

- general guidance on support planning
- risk
- resources
- the choices that must be made available to the supported person and
- information and support

Question 4a: Was this section of the guidance clear and easy to understand? (please tick)

Yes

Yes	No
<input checked="" type="checkbox"/>	<input type="checkbox"/>

Question 4b: How useful did you find this section of the guidance? (please tick)

Quite useful

Very useful	Quite Useful	Not very useful	Not at all useful
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Question 4c: Do you have any further comments on this section of the guidance?

Please provide your suggestions for improvements or additions to this section. Are there any further topics that you would like to see included, any changes that should be made or any other comments you'd like to make?

Angus Council believes would advocate calling this section the person's plan. We believe that to implement SDS effectively professionals should be guided to consider the person's wider world and consider what changes are required collectively to meet the individual's outcomes. Section 5.2 on risk would also benefit from information on risk tolerance and the balance to be made by professionals between risk tolerance and safeguarding. Paragraph 5.3 is helpful in that it begins to explore the wider resources available to an individual; these issues however could be raised earlier in the process as mentioned in response 3c.

Angus Council believes that it would also be helpful to include in this section information about statutory performance indicators and how they will change to address the changing circumstances around support provision. This would allow local authorities and their staff to begin to consider how reporting can be developed in this area.

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Consultation Questions

Section 6 : Monitoring and Review

**Question 5a: Was this section of the guidance clear and easy to understand?
(please tick)**

Yes

Yes	No
<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Question 5b: How useful did you find this section of the guidance?
(please tick)**

Not very useful

Very useful	Quite Useful	Not very useful	Not at all useful
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Question 5c: Do you have any further comments on this section of the guidance?

Please provide your suggestions for improvements or additions to this section. Are there any further topics that you would like to see included, any changes that should be made or any other comments you'd like to make?

Angus Council is of the view that this section is not sufficiently comprehensive. There are different options available in undertaking a review which might include self review for those who have non complex stable needs. This would allow professionals to concentrate on those with the most demanding and changing needs or where significant levels of risk are involved. We would agree that the focus should to be on an individual's outcomes and we would like some guidance about where the 'Talking points' approach sits within review arrangements and reporting to the Scottish Government.

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Consultation Questions

Section 7 : Facilitating genuine choice for individuals

**Question 6a: Was this section of the guidance clear and easy to understand?
(please tick)**

Yes

Yes	No
<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Question 6b: How useful did you find this section of the guidance?
(please tick)**

Not very useful

Very useful	Quite Useful	Not very useful	Not at all useful
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Question 6c: Do you have any further comments on this section of the guidance?

Please provide your suggestions for improvements or additions to this section. Are there any further topics that you would like to see included, any changes that should be made or any other comments you'd like to make?

The guidance provided is a very simplistic view of a complex process underpinned by complex procurement rules. These are often not sufficiently flexible to meet the needs for innovation in delivering support. There are two levels of commissioning that guidance could helpfully consider.

The first is around commissioning for the individual. Guidance on commissioning bespoke packages using option 2 would be helpful. This might include, for example, guidance on whether tripartite agreements are required and what these could look like, how local authorities might respond to requests to commission services from unregulated organisations. This level of commissioning is not reflected in this guidance at all. We would also refer to the Scottish Government's guidance on free personal and nursing care which provides significant detail on individual commissioning arrangements in relation to care home places.

The second area is around the strategic commissioning of social work services more broadly, estimating the need and demand and ensuring that providers including the local authority can respond appropriately.

There are issues in this local authority area in terms of encouraging providers to locate here. We accept that this is not such an issue in larger and more urban authorities but smaller more rural authorities appear less attractive to providers. Guidance on how to overcome such issues would be helpful or how real choice can be delivered in these circumstances would be useful.

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Consultation Questions

Section 8 : The role of the NHS professional

**Question 7a: Was this section of the guidance clear and easy to understand?
(please tick)**

Yes

Yes	No
<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Question 7b: How useful did you find this section of the guidance?
(please tick)**

Quite useful

Very useful	Quite Useful	Not very useful	Not at all useful
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Question 7c: Do you have any further comments on this section of the guidance?

Please provide your suggestions for improvements or additions to this section. Are there any further topics that you would like to see included, any changes that should be made or any other comments you'd like to make?

The guidance as drafted is a good start to thinking through how joint arrangements might support individuals. We would agree that a joint approach has many interpretations with different levels of involvement for different agencies in different circumstances. For many individuals support arrangements run parallel to healthcare plans such as district nursing interventions and AHP treatments.

This provides the best outcomes for individuals in ensuring that support and care are delivered by the right person at the right time. Joint funding arrangements are usually required for those individuals who have the most complex needs. Where support requirements are frequent, unpredictable, changing there are interventions that require additional training often delivered by health professionals. In these cases the level of support required from health colleagues and from social support services is very significant, overlapping and very evidently a poor use of resources.

Also there are frequently plans put in place by health professionals that have to be clearly articulated and understood by the support team such as anticipatory care plans. Often monitoring of the status of the individual and decisions made about particular interventions are clinical in nature. For the most part the tasks involved might be undertaken by a family member if one was available however the same tasks in a hospital environment would not be undertaken by a healthcare assistant but a qualified nurse. Our experience in relation to this type of joint arrangement is that all the existing guidance available on the matter is insufficient to support robust decision making particularly around funding. It would therefore be particularly helpful at this time to develop guidance that would support discussions between agencies effectively on the practical aspects of such arrangements and how a shared approach to funding and pooling of budgets might be achieved for individuals that

require such support. This might include some focus on the application and interpretation of CEL 6/2008 in relation to joint packages where there are continuing healthcare needs but eligibility for NHS continuing healthcare is not met and some further reflection on how NHS continuing care can be provided at home rather than in an institution. CEL 6/2008 is limited in its reflection and interpretation of these matters.

More particularly it would be helpful if the examples in paragraph 86 also included examples where issues relating to a persons mental health and/ or learning disability might require shared funding. Implementation of behaviour management plans requires training from and oversight by health professionals. Such plans can require interventions that require a clinical like judgement about when to give medication. We would suggest that such support is likely to require a shared funding approach.

In paragraph 87 second bullet point whilst the NHS can transfer funding to pay for aspects of social care we would suggest that this should confirm that resources can be transferred to pay for health care (although this is raised later). This paragraph should also highlight that a local authority can transfer resources to the NHS to fund aspects of social care. This section should also highlight that whilst resources and tasks/ functions can be transferred responsibility cannot. This would allow users of the guidance to understand the importance of raising the role of the health professional in paragraph 91 on monitoring and review. In transferring these functions the NHS remains responsible for ensuring that staff undertaking healthcare tasks are properly trained and monitored.

Option 1 provides the best outcomes in relation to the delivery of this type of support as there is a discrete group of staff that can be trained and supported by the right professionals. Health funding is more likely to be used to ensure that all staff working with an individual can provide both the health and social support that an individual requires rather than the guidance provided in paragraph 90 on the employment of a second personal assistant to provide health care at certain times each day. Very often the health needs are unpredictable for example in epilepsy or diabetes care or the management of aspiration and suctioning, the examples provided in paragraph 86.

All of these issues have existed in developing the jointly funded package around case study 2.

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Consultation Questions

Section 9.1 : Children and Families

**Question 8a: Was this section of the guidance clear and easy to understand?
(please tick)**

Yes

Yes	No
<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Question 8b: How useful did you find this section of the guidance?
(please tick)**

Not very useful

Very useful	Quite Useful	Not very useful	Not at all useful
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Question 8c: Do you have any further comments on this section of the guidance?

Please provide your suggestions for improvements or additions to this section. Are there any further topics that you would like to see included, any changes that should be made or any other comments you'd like to make?

Angus Council is of the view that the application of SDS for children and families feels a little bolted on. A decision needs to be taken if separate guidance should be produced for SDS that can be integrated within GIRFEC.

Section 8 applies to children where parents are not available to meet needs, require respite or require placement at a specialist residential school. The NHS must be fully engaged in decision making processes, funding and governance arrangements around appropriate placements and respite where healthcare is an issue. There has been significant work already in local authorities on developing GIRFEC with good integrated assessment processes, a strong focus on outcomes in delivering the child's plan and the role of the named person. This learning could be applied by community care services. We believe that the guidance currently does not accurately reflect the wording of GIRFEC in paragraph 93 and paragraph 97.

Angus Council would also like to have clear guidance on the use of option 1 where the child is on the child protection register. We would suggest rewording of paragraph 103, guardianship is not required in every case and we continue to encourage parents to take the least restrictive option as required by the AWI Act. We would agree that this will be required where families wish to use option 1 for ongoing support in adulthood.

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Consultation Questions

Section 9.2 : Supported decision-making and circles of support

**Question 9a: Was this section of the guidance clear and easy to understand?
(please tick)**

Yes

Yes	No
<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Question 9b: How useful did you find this section of the guidance?
(please tick)**

Quite useful

Very useful	Quite Useful	Not very useful	Not at all useful
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Question 9c: Do you have any further comments on this section of the guidance?

Please provide your suggestions for improvements or additions to this section. Are there any further topics that you would like to see included, any changes that should be made or any other comments you'd like to make?

Draft Statutory Guidance on Care and Support

Consultation Questions

Section 9.3: Carers

**Question 10a: Was this section of the guidance clear and easy to understand?
(please tick)**

Yes

Yes	No
<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Question 10b: How useful did you find this section of the guidance?
(please tick)**

Quite useful

Very useful	Quite Useful	Not very useful	Not at all useful
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Question 10c: Do you have any further comments on this section of the guidance?

Please provide your suggestions for improvements or additions to this section. Are there any further topics that you would like to see included, any changes that should be made or any other comments you'd like to make?

Angus Council would suggest that there is a mismatch between the examples provided in table 9 and the circumstances under which carers charges should be waved in the proposed regulations. We believe that the regulations undermine the ethos of SDS as once a local authority determines to provide a support to a carer the carer will then have access to SDS options. This would mean that the carer can spend allocated resources on support or services of their choosing that meet the agreed needs and outcomes. It would have been helpful if the examples had included the options around funding holidays etc, so that local authorities could understand the practical application of the regulations.

Draft Statutory Guidance on Care and Support

Consultation Questions

Section 9.4: Direct payments

**Question 11a: Was this section of the guidance clear and easy to understand?
(please tick)**

Yes

Yes	No
<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Question 11b: How useful did you find this section of the guidance?
(please tick)**

Quite useful

Very useful	Quite Useful	Not very useful	Not at all useful
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Question 11c: Do you have any further comments on this section of the guidance?

Please provide your suggestions for improvements or additions to this section. Are there any further topics that you would like to see included, any changes that should be made or any other comments you'd like to make?

Further guidance on the continuation of direct payments when someone is in hospital would be helpful. In Angus we operate a system whereby the direct payment is fully funded for 4 weeks then reduced to half funding for the next four weeks when someone is in hospital. It would also be helpful to have guidance on the local authority's responsibilities in relation to redundancy payments when staff are employed via direct payments.

Personal assistants remain an unregulated social care workforce and Angus Council has always required direct payment recipients to undertake disclosure. (PVG scheme) in relation to any staff that they employ. We have allowed the cost of this to be funded through the direct payment as we believe that this demonstrates good employment practice. We would like to see included in the guidance a mechanism were the direct payment can be withdrawn in situations where direct payment recipients are not acting as good employers.

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Section 9.5: Wider legal duties and strategic responsibilities

Question 12a: Was this section of the guidance clear and easy to understand? (please tick)

Yes

Yes	No
<input checked="" type="checkbox"/>	<input type="checkbox"/>

Question 12b: How useful did you find this section of the guidance? (please tick)

Quite useful

Very useful	Quite Useful	Not very useful	Not at all useful
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Question 12c: Do you have any further comments on this section of the guidance?

Please provide your suggestions for improvements or additions to this section. Are there any further topics that you would like to see included, any changes that should be made or any other comments you'd like to make?

In respect of paragraph 149 - charging. Angus Council would suggest that guidance on charging for joint care packages with the NHS is produced.

Draft Statutory Guidance on Care and Support

Consultation Questions – General Questions

The Guidance document as a whole

Question 13: Do you have any further general comments on the guidance?

For example, are there any gaps in terms of the topics covered by the guidance? Are there any major changes that you would recommend? Do you have any comments on the style and layout of the guidance, or the language used in the guidance?

Angus Council believe that the layout and the wording of this section is helpful. In the main the guidance appears to be written to support adult services with information relating to how SDS affects children and families being 'bolted on'. We would recommend separate guidance for children's services is developed within the context of GIRFEC.

The costs and benefits arising from this guidance

Question 14: Do you have any comments on the financial costs or benefits of the requirements set out in the guidance?

Can you identify any financial costs or benefits to individuals, local authorities, health boards, providers or any other person or organisation affected by the guidance. In considering the costs and benefits you may wish to consult the Business Regulatory Impact Assessment published for the Social Care (Self-directed Support) (Scotland) Act available at the following hyperlink:

<http://www.scotland.gov.uk/Publications/2012/03/5525>

We plan to update the BRIA in light of the comments and information from this consultation.

See response to carers' charging

The equality and human rights impacts of the guidance

Question 15 (a): Do you have any views on the impact of the guidance on any or all of the following equality categories:

- i) age;**
- ii) disability**
- iii) gender;**
- iv) lesbian, gay, bisexual and transgender;**
- v) race, and;**
- vi) religion and belief**

Some advice to help you to answer this question - By "equality impacts" we mean whether or not the guidance will affect certain groups in a positive or a negative way. In considering the impacts you may wish to consult the Equality Impact Assessment published for the Social Care (Self-directed Support) (Scotland) Act available at the following hyperlink:

<http://www.scotland.gov.uk/Publications/2012/03/9876>

We plan to update the Equality Impact Assessment in light of the comments and information from this consultation.

None

Question 15 (b): Do you have any views on the impact of the guidance on human rights?

For more information about human rights please see the Scottish Human Rights Commission's website at:

<http://www.scottishhumanrights.com/abouthumanrights/whatarehumanrights>

None

Consultation Questionnaire

Draft Regulations

Consultation Questions

Question 1: What are your views on Part 2 of the draft Regulations (calculation, payment and termination of direct payments)?

Angus Council agrees that Part 2 of the regulations is helpful in taking forward approaches to the calculation, payment and termination of direct payments. We would propose however that in regulation 4 the option for the service user to request payment be paid in gross is withdrawn. This adds an administration burden to the direct payments process. Angus Council has used net payment for direct payments for several years and has encountered no difficulty from this approach.

Question 2: What are your views on Part 3 of the draft Regulations (appropriate/inappropriate circumstances for the employment of close relatives)?

Angus Council would recommend that the existing arrangement of employment of close relatives in “exceptional circumstances” is retained. The circumstances defined in Regulation 9 could best be applied as part of the guidance. We believe that employing close family relatives changes the nature of the relationship between individuals in a detrimental way. We believe that understanding the nature of relationships within a family and the impact of employing a relative, and in what circumstances, is best undertaken as part of an analysis by a professional underpinned by appropriate guidance.

Question 3: What are your views on Regulation 11 which deems individuals who are placed under a variety of criminal justice orders to be ineligible to receive direct payments?

For example, is it appropriate to impose the exclusions listed in Regulation 11? Are there any persons not listed in regulation 11 to whom it would be inappropriate to offer the option of a direct payment?

Angus Council would agree that regulation 11 identifies individuals who should be ineligible for direct payments. We would recommend the Scottish Government reconsiders the approach to eligibility of people subject to compulsory orders and compulsory treatment orders as often support arrangements are reviewed and changed frequently.

If the current position continues we would ask for guidance on circumstances in which we could use our judgement to temporarily refuse a direct payment with written evidence. Angus Council would wish to see in the regulations the addition to the descriptions of persons ineligible to receive direct payment, i.e. “children on the child protection register”. It is our opinion that parents of children on the child protection register have demonstrated the need to improve parenting skills. It would be our wish to support families to do so in circumstances that would ensure the

safety of the children and therefore services should continue to be under the control of the local authority.

Question 4: What are your views on restricting access to direct payments for those who are homeless, those who are fleeing domestic abuse or those who require support in relation to drug or alcohol addiction?

Angus Council agrees that these are appropriate restrictions.

Question 5: What are your views on restricting access to direct payments in relation to the provision of long-term residential care?

This question was raised during the initial consultations on a draft SDS Bill. The Scottish Government would like to invite detailed views before making a final decision prior to the laying of the Regulations before the Scottish Parliament. Should the restriction be removed from the final regulations, thereby allowing direct payments for residential care? Or should it be retained? Please provide reasons as to your support or opposition to requiring authorities to provide direct payments for residential care.

Angus Council would suggest that there is no benefit in providing access to direct payments in relation to residential care. We are particularly concerned that people taking a direct payment would be treated as self-funding and charged at a rate greater than the nationally agreed rate which we would provide through direct payment.

If this approach is being considered due to lack of choice we would propose that existing choice protocol post hospital discharge is applied. Where self-funders of residential care are eligible for free personal and/or nursing care a direct payment for that amount could be affected. Angus Council would also suggest that to give effect to the full SDS options self-funders should be able to pay local authorities for their whole care and have it purchased on their behalf, taking advantage of nationally agreed rates and the national care home contract.

Question 6: The draft Regulations do not specify circumstances where the direct payment option should be unavailable for care and support to children/families. *Should* there be specific restrictions on choice of support in relation to children/families support (i.e. support provided under Section 22 of the Children (Scotland) Act 1995) and should these restrictions apply to the direct payment only, or to other options as well?

Restrictions to children on the child protection register must be included and should apply to option 1, 2 and 4 in so far as that applies to options 1 and 2.

Question 7: Do you have any further comments on the draft Regulations?

For example, are there any gaps in terms of the topics covered by the Regulations? Are there any major changes that you would recommend? Are there any topics that are more appropriate for statutory guidance rather than Regulations?

None

Draft Regulations

Consultation Questions – General Questions

The costs and benefits arising from these regulations

Question 8 : Do you have any comments on the financial costs or benefits of the Regulations?

Can you identify any financial costs or benefits to individuals, local authorities, health boards, providers or any other person or organisation affected by the Regulations. In considering the costs and benefits you may wish to consult the Business Regulatory Impact Assessment published for the Social Care (Self-directed Support) (Scotland) Act available at the following hyperlink:

<http://www.scotland.gov.uk/Publications/2012/03/5525>

We plan to update the BRIA in light of the comments and information from this consultation.

Angus Council is particularly concerned about the loss of cost control in relation to provision of direct payments for residential care. We believe that if this option exists people securing care may be considered as self-funders and therefore could be subject to higher rates and top-ups. We are also concerned that some providers may choose not to contract with us for any provision but only contract with individuals who are self-funders or have direct payments.

The equality and human rights impacts of the regulations

Question 9 (a): Do you have any views on the impact of the Regulations on any or all of the following equality categories:

- i) age;**
- ii) disability**
- iii) gender;**
- iv) lesbian, gay, bisexual and transgender;**
- v) race, and;**
- vi) religion and belief**

By “equality impacts” we mean whether or not, and in what ways, the Regulations will affect certain groups, and whether they will impact on those groups in a positive or a negative way. In considering the impacts you may wish to consult the Equality Impact Assessment published for the Social Care (Self-directed Support) (Scotland) Act 2013, available at the following hyperlink:

<http://www.scotland.gov.uk/Publications/2012/03/9876>

We plan to update the Equality Impact Assessment in light of this consultation.

Question 9 (b): Do you have any views on the impact of the Regulations on human rights?

For more information about human rights please see the Scottish Human Rights Commission’s website at:

<http://www.scottishhumanrights.com/abouthumanrights/whatarehumanrights>