

3 July 2013

Self Directed Support Team
Adult Care and Support Division
Health and Social Care Integration
Scottish Government
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Dear Sir/Madam,

Consultation Comments on draft regulations and statutory guidance to accompany the Social Care (Self-directed Support) (Scotland) Act 2013

Scottish Autism welcomes the opportunity to comment on the draft regulations and statutory guidance to accompany the Social Care (Self-directed Support) (Scotland) Act 2013. Previously we have commented on the Self-Directed Support: A Draft Bill for Consultation which was also developed by the Self Directed Support Team at the Scottish Government.

Scottish Autism is overall supportive of the general detail within the proposed regulations and guidance and approves of the various recommendations empowering individuals to shape and control their support networks which best meet their specific needs. There are however several points which Scottish Autism would like to highlight for particular consideration in relation to the implementation of the proposals.

- It is vital to ensure that the specific needs of people with autism are carefully considered within the assessment process to ensure their proper engagement in self-directed support. Consideration should be given to communication methods and approaches which are designed to include the individual with autism in the assessment model being adopted by local authorities. It is Scottish Autism's experience that the level of understanding of autism by care managers can be varied across Scotland, and therefore there is a concern that this can have a potential detrimental impact on assessment and delivery of services in line with the specific needs of people with autism.

- Scottish Autism would specifically highlight the need to ensure sufficient funding within the Resource Allocation process of self-directed support in order to ensure that individual need is best met whilst providing choice and control for individuals, especially those with autism. Any Resource Allocation System developed by local authorities should not result in a significant reduction in current resources such that care packages have to be dramatically redesigned. As a specialist provider of support services to individuals with autism, Scottish Autism would stress the need to ensure that the needs of specialist and individual provision are promoted within strategies for self-directed support. Scottish Autism has encountered a perception amongst many local authorities that generic providers can deliver a service type which 'fits all'. However, it is Scottish Autism's experience that this generic approach can result in a low quality service delivering poor quality outcomes for the person with autism - the service is delivered, but the service is not maximising the outcomes for the individual.

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- Scottish Autism would indicate that the provision of specialist services within the context of self-directed support must be strengthened by ensuring a consistency in approach and practice across local authorities in commissioning and procurement of social care services which includes self-directed support processes. This would encourage local authorities to abide by the principles of self-directed support by moving to commissioning services for individuals, whilst offering providers the consistency to enable them to diversify service offerings and build capacity.

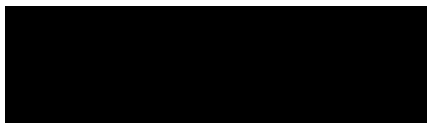
- Scottish Autism has invested heavily into its quality assurance, governance and policy frameworks in order to improve on the quality of our outputs to service users. Currently our operational and business practices are closely scrutinised by purchasing local authorities with whom business relationships have been established and nurtured. However concerns are raised with the prospect that an open market approach may be adopted by local authorities that could result in an upsurge in low quality non-governed providers, with a consequential detrimental impact for service users. Therefore careful consideration must be given to how local authorities develop the local service market which ensures choice whilst minimising any form of personal, operational or business risk.

- Scottish Autism would highlight the recently established autism specific self-directed support initiative which is co-managed by Scottish Autism, Autism Initiatives and the National Autistic Society. This initiative is designed to help people with autism and their carers to direct their own support in Scotland, and offers a single, impartial referral point for help with choosing an autism specific service. It also offers help and advice to local authority professionals on how to assess people with autism seeking self-directed support. This is a valuable resource which should be utilised for the benefit of people with autism engaging with self-directed support, whether they are seeking a service or conducting an assessment.

- Finally and in order to reinforce the all of the above, Scottish Autism would highlight the Scottish Governments Strategy for Autism which requires that people with autism have access to services which understand their needs and which are able deliver in ways specifically related to their autism. This is designed to improve the quality of life of people with autism, maximising their potential and not merely looking after their physiological requirements. The Strategy recognises that such individuals *"often have complex needs that have a direct impact on their health and wellbeing as well as their overall quality of life. It is essential therefore that the services that are commissioned and developed are....specialist when needed, across the lifespan"*.

Scottish Autism would ask that careful consideration is given to these points within the context of finalising the regulations and guidance for Self-Directed Support. We are also appreciative of the opportunity from the Scottish Government to engage and respond on these important matters.

Yours sincerely,

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Alan Somerville
Chief Executive
Scottish Autism