

Consultation Questionnaire

Draft Statutory Guidance on Care and Support

NOTE: Sub Group2 of the National Autism Strategy Reference Group held a consultation event on the SDS guidance on 21st June attended by people with autism, their families and some professional staff. This response is based on the work carried out at that event. The statements in quotations are direct comments from participant. The remainder of the text is a summary of the points made at the event and further discussion of the event. If you require any clarity then please get in touch.

Consultation Questions

Section 2 : Person's Pathway

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

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

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

Very useful	Quite Useful	Not very useful	Not at all useful
<input 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?

"How do we know the assessor understands autism properly."

People with autism often have a particular way of seeing the world. They can find it hard to engage with people and their reactions may be not what other people expect. This can make it hard for them to communicate with people who do not understand autism.

It would be helpful at an early stage in the guidance, to have some recognition within the Person's Pathway that there will be "reasonable adjustment" for the needs of individuals who have particular and sometimes unseen communication needs. Not all social workers have the skills to deal with everyone who is referred to them and some thought will need to be given to this.

"There is a judgement about capacity to take part. Even only a minority of parents have the ability

to really understand what it is all about. How can we help parents be empowered within the SDS process?”

“Need more clarity on the rules for guardianship. People with that capacity can be at all the meetings.”

The roles and responsibilities section lacks clarity on the role of guardians. While this is mentioned in the “unpaid carer”, those who have guardianship have the same roles and responsibilities as the “supported person”. This somehow seems to downplay the rapid growth in guardianship that has accompanied the introduction of SDS in some parts of Scotland. There is a qualitative shift when an unpaid carer takes guardianship that needs to be acknowledged.

Draft Statutory Guidance on Care and Support

Consultation Questions

Section 3: Values and Principles

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

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

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

Very useful	Quite Useful	Not very useful	Not at all useful
<input 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?

Comments

Draft Statutory Guidance on Care and Support

Consultation Questions

Section 4: Eligibility and Assessment

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

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

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

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

“There is a danger that high functioning people with Asperger’s could get left behind.”

“Statutory guidance needs to expand on eligibility criteria – invest in lower crisis service in order to save in the long term.”

Further thought needs to be given to the way that Eligibility Criteria are applied. Many people with Asperger’s Syndrome fall outwith this criteria and receive no services or support. However they have clearly identifiable needs. There needs to be a question about whether the current range of Eligibility Criteria properly takes into account people with autism and whether adjustments should be made to take account of this.

Section 22 is unclear in its implication as it implies that there is a standard set of criteria for adults in Scotland but each local authority currently set their own. Does the word “adults” actually mean older people or is it referring the COSLA guidance.

“Assessment must be flexible and communicate appropriately.”

“Need to recognise issues of communication on assessment. There should be a gradual process of getting to know people .”

“Should be an autism specific team within SW to deal with assessment to make sure they are adequately done. “

“It is harder for people with autism to answer questions and to offer appropriate information or even to understand the process or comprehend the benefits”

“Better assessments have to be done as the one that we have (in Glasgow) won’t work.”

People with autism can find the assessment process and in particular the new Self Evaluation Questionnaires confusing and bewildering. Many people have said that they feel assessments are like exams and they get very anxious about them. There have been some suggestion that assessments should be simplified to help people understand what is

being asked and when they might get help but in all situation a personal approach for each individual will help. .

The assessment is the key step in supporting people with autism to get the support that they need. The guidance must be flexible in making sure that there is a relationship between the assessor and the assessed. Some limitations placed on assessment by social work such as 2 half hour sessions to carry them out with no previous contact means that individuals and families have little confidence in them delivering any real results.

The guidance needs to be stronger on the question of Self Evaluation Questionnaires. Current practice in Scotland means that Self Assessment has been superseded by the use of Self Evaluation Questionnaires. These are not meant to be a full assessment but are being used as a key part of the information gathering exercise. Much of the social work contact and expertise is in processing the information collected in the SEQ. The only additional information used in normally historical, from the files.

Many of the individual consulted felt that much more effort had to be put into collection of information for assessment than is currently done. This will take time to learn the right way to communicate, to have a sound understanding of the nature of autism and a degree of flexibility to correlate information from various sources.

Draft Statutory Guidance on Care and Support

Consultation Questions

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

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

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

SUPPORT PLANNING

“Person Centred Planning should have the person inviting who they want and then talk about the individual and what they want or like.”

“People’s experience of support plans have been positive. How can we do support planning with people who aren’t getting full support packages”

Many people spoke about the importance of support planning. Person Centred Planning was felt to be really helpful for some people. While this wasn’t seen as a panacea or even suitable for everyone, it should be recognised within the guidance so that there is an understanding of the range of assessment techniques and durations that could be necessary.

For personalisation to meet an individual with autism’s needs there must be a clear understanding how a person’s routines and rituals affect their life – this is only possible where there is good support planning

“Some people with autism find it hard to imagine the future”

Others talked about who they needed to experience different options so that they could see what happened. It was hard to know what they would feel like or what they would enjoy without actually doing it. This challenge with imagination is quite common amongst people with autism and suggests that the support planning process might have to be a continual reiteration as different options are gone through. This would help with situation where people are seen as refusing a service because they have turned down a number of options.

RISK

“Parents constantly worry about future planning instead of living in the now.”

“Family carers often see themselves as the carer of last resort – when things go wrong or support doesn’t turn up

Risk was hard to manage again as many people with autism are not able to imagine the consequences. They may have unrealistic visions of what they can manage. Support planning can only effectively understand risk when the assessment has made good job of understanding the individual.

RESOURCES

“Glasgow has been a real problem. There was a notice of termination of service – sudden cuts – communication problems. When there are 20% cuts in service its hard to feel optimistic about SDS.”

“With cuts its difficult to get social services.”

“Everything is determined by cost but it doesn’t always have to be about money. “

“Parents who are “pushy” and “shout louder” get more of a service as opposed to people who are really in need.”

The question of available resources to people with autism is important. There should be a transparent system for understanding how resources are allocated. Published Resource Allocation Systems are only one part of the process. Transparency should also apply to any process of adjustment of the initial budget. This should not take place behind closed doors.

The guidance fails to mention that people should be given an explanation of how their budget could meet their needs so that they can make an informed choice. Transparency and rational decision making must apply in every case and the only way this can be delivered is if every case is given such an explanation.

There were concerns that the amount of money allocated for individual budgets is not always sufficient to meet eligible needs. There are significant concerns that specific groups of vulnerable people do not meet the eligibility criteria to access adequate funding to fulfil their potential and maximise quality of life. Any Resource Allocation System - a way of allocating money - should adequately recognise the needs of adults with autism.

A number of people would prefer a single system for all of Scotland. Local variation should be in what was available to spend these resources on and what types of services were available as opposed to a variation in headline resources.

Personalisation can only work when there is a sufficient range of support options for people to choose from. There is a need for local authorities to stimulate the market to ensure there is a range of appropriate support services for people with autism to choose to purchase.

Information and Advice

“Training should be given to professionals, carers and parents together”

“Social enterprise workshops on employment could help people understand being an employer.”

“Is there enough joined up thinking between schools and social work?”

“We need to develop appropriate information to help people make choices. “

“There needs to be better use of advocacy services particularly in guiding people through the system. “

“How do we find out what is out there – The mapping of autism services through the strategy would be helpful.”

Shared training between professionals and carers was seen as being very important as it would do two things. First it would break down some of the barriers that exists but it would also alter the focus on the “technical” tasks that seems to dominate professional understanding of SDS.

There is a need to consider how help and brokerage will be funded and how to ensure people with autism can access this support directly or through a social worker.

Overall the comments made were generally supportive of the terms laid out in the guidance. Again the main point of difference is that Autism Specific Services are particularly important for this group of people as it helps people be understood

The guidance should stress more the importance of accessible communication and the often individual nature of it. Easy Read may help many people but it is often a “moderated” process that needs a staff member to assist. CDs, DVD, speaking websites can all be helpful. Even developing an assessment or Eligibility Criteria app for mobile phones and iPads would allow people to access important information in a way that suits them.

Older people and people in rural areas might access to new technologies more difficult. More traditional forms of communication such as the use of intermediaries such as GPs to alert individuals to the availability of types of support .

One issue that needs to be tackled, possibly in this guidance but maybe elsewhere is the development, agreement and use of shared symbols, sign and pictures to illustrate Self Directed Support documentation.

Draft Statutory Guidance on Care and Support

Consultation Questions

Section 6 : Monitoring and Review

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

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

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

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

It would be helpful if the guidance stated a normal recommended period for a review to take place. We would suggest that there should be annual reviews. While it is possible to have a review every time a person's needs change, for most the scheduled review will be more common.

Draft Statutory Guidance on Care and Support

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

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

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

“Despite the fact that there are 4 options we are often only focussed on 2 - Direct Payments and Individual Funds.”

A number of people felt that many people with autism would have little interest in doing the organising of direct payments or Individual Service Funds and would want to have the local authority organise support or at most have a mix and match option. But often it seems the attention is focussed on the first two.

However it was made clear that few people who ask for local authority arranged services are really passive, currently they negotiate access, options, what activities will be done and

so on.

They wanted it to be seen that personalisation is a state of mind that society has been moving towards. Few people are truly passive in receipt of care, they are continually adjusting and reshaping them within the constraints of that services. This should be stated within the guidance in order that local authorities should work to maximise the level of individual choice even where they are arranging all or part of someone's service for them.;

Draft Statutory Guidance on Care and Support

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

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

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

that are more appropriate for statutory guidance rather than Regulations?

Comments

Draft Statutory Guidance on Care and Support

Consultation Questions

Section 9.1 : Children and Families

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

Yes	No
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<input type="checkbox"/>	<input type="checkbox"/>
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**Question 8b: How useful did you find this section of the guidance?
(please tick)**

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

It has been shown that early intervention has a very positive effect on future life planning and resulting positive destinations. All young people with additional support needs should have the opportunity to begin planning for transition to young adulthood when this is deemed appropriate but at the very minimum 14 years old.

For this to be effective though the individual should have an idea of the level of support and resources that may be available to them, if any. It is recognised that this may change as individuals will continue to mature and change into early adulthood but at the very least an "indicative budget" should be available as well as information on the type and quantity of resources that should be provided for that amount.

There should be accessible information, which is inclusive of young peoples personalised communication needs (such as, audio video, assistive technologies, board maker), for young people and families that clearly shows what support they are entitled to in the transition period, how they can access it and that covers all options that are available to them. This should include clear information about their statutory rights, including those relating to the upcoming Children and Young People Bill and other relevant transitions legislation such as, the Education (Additional Support for Learning) (Scotland) Act, Children's Act, Adult Health and Social Care Act, Health, Protection of Vulnerable Adults, Guardianship and Social Care (Self Directed Support) (Scotland) Act amongst others.

The guidance would be strengthened if it place particular responsibilities on the Education Department within local authorities such as:

- Education should take the lead in co-ordinating services as under the Education (Additional Support for Learning) (Scotland) Act as it is the responsibility of schools Named Person to coordinate young people's transition initially. This role is not fully realised in some education departments in Scotland even though it is a duty.
- There should be a dedicated Transitions Team in every Local Authority. The team may consist of other professions than solely social work. . This team should work with young people between the ages of 14 to 25 years in line with the Children and Young People Bill's suggested age range for Looked after Children.
- There should be a key worker available to all young people who need them over the

transitions period.

Draft Statutory Guidance on Care and Support

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

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

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

“There can be too many expectations on family”

“Safeguarding to ensure that people make their own choices”

“Sometimes people don't want their families too involved”

“Many don't have a family”

Some people with autism and their families have a close relationship and others don't. There should not be an automatic assumption that families will provide support.

There needs to be new forms of help to ensure that the person with autism take as much control as possible over their supports and life design. Circles of support may help here but many individuals will have few connections in their lives already from which to building lasting support circles. Overall this support should be continuous throughout the SDS pathway and also be able to help people manage their assessment and any discussions over individual budgets.

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

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

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

A Parent's Perspective

- Doesn't feel that their child can cope with the process
- Parents feel exhausted with the changes and there is a lack of awareness of this in SDS departments
- Worry that appropriate services won't be provided
- Concern that they will be more isolated if services are not appropriate
- This may lead to an impact on the child's mental health and behaviours
- Very worried for the future and need to keep on top of it.
- How can social work know what a child needs with 2 x ½ hour sessions.

"Where the whole family is not coping they can descend into crisis. There is a need for support ."

"Parents are forward thinking to what will happen after death. How will their young people cope? Who will support them? The local authority may assume guardianship."

"Parents of autistic people are desperate and desolate – who can help?"

We think this is an important section. There is little that we would add at this point except that many of the parent's who spoke emphasised their tiredness and need for support. With the local authorities not having a "duty" to provide support, we will have to see whether the proposals being the change that these carers feel they need.

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

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

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

"People are forced into Direct Payments in order to get some control."

The guidance overall needs to ensure that local authorities commission or otherwise organise services that promote control but can be accessed through other SDS options.

Under the Monitoring and Administration of Direct Payments section, it would be helpful to include a requirement or a suggestion that local authorities look at systems that make it easier for individuals to use. Over burdensome systems such as the amount of receipts that have to be collected can put people off taking control of their support through a Direct Payment.

Some systems such as the "Card" system used by some councils allow council close monitoring of payments without excessive paperwork. It should be suggested that councils have the option of paperless systems of Direct Payment monitoring.

Draft Statutory Guidance on Care and Support

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

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

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

Comments

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?

Comments

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.

Comments

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.

Comments

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>

Comments

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)?

Comments

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

Comments

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?

Comments

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?

Comments

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.

Comments

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?

Comments

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?

Comments

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.

Comments

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.

Comments

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>

Comments