

26 June 2013

Peter Kelly  
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Dear Peter

— **Consultation on “See Hear” A strategic framework for meeting the needs of people with a sensory impairment in Scotland**

COSLA’s Health & Wellbeing Executive Group broadly welcomes the draft strategy and within that context we would like to offer the following observations which we trust will be helpful in arriving at a final strategy.

In general terms, we endorse the argument articulated in the strategy that by providing services and support at an earlier stage individuals will be better supported and able to live independently with their conditions and that this approach may, over time, make less demands on services and lead to long term benefits to individuals and to agencies. This is in line with current thinking on the benefits of early intervention. Our members can see that helping individuals to live more independently may bring long term savings.

Our members also felt the strategy will raise the profile of sensory impairment. While this would be a positive development, it might also increase demand and raise expectations around the services and support that people with a sensory impairment can expect to receive. The Scottish Government should ensure that the funding that will support the strategy is capable of meeting these expectations. We are pleased that the document recognises the ageing demographic which will increase demand for services and also notes the tight budgetary situation.

In more general terms we welcome the prominence being given to the outcomes the strategy is designed to deliver against, with a corresponding focus on care pathways.

In terms of the detail of the strategy, we think that the recommendations are reasonably set out so long as the Scottish Government is willing to fund any additional activity in support of these. Our analysis of the 6 recommendations is as follows:

- i. ***There should be an audit of all spend and that this should lead to consideration for the realignment of spend as appropriate.*** As outlined in the strategy, there is a broad context of increasing demand sitting alongside a decrease in available funding. We

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would agree therefore that it is important to understand what the current expenditure is against services for people with a sensory impairment, and the extent to which this is reflected in other workstreams, e.g. the Reshaping Care for Older People and Self Directed Support, in order to inform options for future spending patterns.

- ii. ***The strategy calls for basic screening to be considered for people at an agreed age.*** The strength of this recommendation is that it potentially supports an early intervention agenda: screening could potentially identify sensory impairment earlier than it might otherwise have been detected and could have a consequential positive impact in avoiding negative outcomes (e.g. it could reduce the risk of falls). On the other hand, screening tends to be an imprecise instrument and therefore careful thought would need to be given to its use and how it is targeted.
- iii. ***The call for mandatory training of staff in health and social care settings*** could incur costs, which would need to be carefully considered. While there is certainly a case to be made for additional training, the strategy is unclear about how it will be mandated and which staff groups should be prioritised. We would argue against prescription on this particular recommendation. We think that rather than training being mandatory the benefits of training staff to have sensory impairment awareness should be emphasised. While our members recognised the importance of the skills agenda, it might be worth recasting this recommendation as follows:
  - a. ***At a national level, the Scottish Government should scope out the range of formal and informal training opportunities in the area of sensory impairment;***
  - b. ***At a national level, the Scottish Government should work with the relevant education, training and qualification bodies (such as SSSC, NESS, SQA) to explore opportunities to increase awareness and expertise in the area of sensory impairment, building appropriate content into the core training regimes of different professional groups***
  - c. ***Local partnerships should audit their skills base, identify any skills deficits that exist in the workforce and take steps to address these***
- iv. ***The fourth recommendation around responding to need and developing care pathways,*** is well observed and consistent with the broader commissioning agenda.
- v. ***On systems for sharing information on those with a diagnosed sensory impairment*** we agree with the recommendation and are content that the focus is on the development of local data recording/sharing. In principle, this supports good commissioning practice.
- vi. ***On compliance with the Equality Act 2010 needing to be scrutinised*** our sense is that this is a useful reminder about a pre-existing statutory duty – and are satisfied that it does not place any new demands on local authorities.

Yours sincerely



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COSLA