

## **Introduction and general comments**

This response is from the NHS Education for Scotland (NES). We are a national special health board working in partnership with our stakeholders to provide education, training and workforce development for those who work in and with NHSScotland. Our mission is to provide quality education that enables excellence in health and care for the people of Scotland and which leads to a healthier Scotland for all.

We have a Scotland-wide role in undergraduate, postgraduate and continuing professional development, working closely with our frontline educational support roles and networks. Our aim is to improve health and care through education and a significant proportion of our work focuses on the clinical workforce. We prepare professionals for practice in medicine, dentistry, clinical psychology, pharmacy, optometry and healthcare science and we provide access to education for nurses, midwives, allied health professionals, healthcare chaplains, healthcare support workers and administrative, clerical and support staff.

NES and the Scottish Social Services Council (SSSC) were commissioned by the Scottish Government to develop the Equal Partners in Care (EPiC) core principles for working with carers and young carers. These can be found at [www.knowledge.scot.nhs.uk/home/portals-and-topics/equal-partners-in-care.aspx](http://www.knowledge.scot.nhs.uk/home/portals-and-topics/equal-partners-in-care.aspx). The Core Principles are based on six outcomes for carers. These include the following:

- Carers are identified
- Carers are supported and empowered to manage their caring role
- Carers are recognised and valued as equal partners in care

The principles are identified at three levels, ranging from level 1 ('carer aware') to level 3 ('planning with carers as equal partners'). We also continue to develop a series of learning resources to support the promotion and use of the core principles. We have referred to the core principles throughout our response.

## **CONSULTATION QUESTIONS**

### **The Carer's Assessment: Carer's Support Plan**

Question 1: Should we change the name of the carer's assessment to the Carer's Support Plan?

Yes

No

During the development of the Equal Partners in Care (EPiC) core principles we asked a number of stakeholders (including carers) for their views on the terms "Carer's assessment" and "Carers support plan". The stakeholders told us that they preferred the term 'Carer's Support Plan'. The term 'assessment' was viewed as a potential barrier to accessing support.

Question 2: Should we remove the substantial and regular test so that all carers will be eligible for the Carer's Support Plan?

Yes No

One of the intended outcomes of the EPiC core principles is that 'Carers are supported and empowered to manage their caring role'. This applies to all Carers so the removal of the substantial and regular test is consistent with this outcome. Removing barriers to the identification of carers and offering appropriate support and signposting early on in their journey has the potential to improve outcomes and minimise the need for more costly interventions at a later stage

The widening the eligibility criteria may have workforce implications as more staff may become involved in the development of carers support plans. At the moment this may be more likely to impact on local authority staff but with progression towards health and social care integration it may also impact on NHS staff.

Question 3: Should we remove that part of the existing carer assessment process whereby the cared-for person is a person for whom the local authority must or may provide community care services/children's services?

 Yes No

We welcome this proposal. It is consistent with recognising carers needs in their own right and has the potential to reduce barriers to support. It has potential to improve access to support in more complex situation e.g., where the carer wishes to access support and the person they care does not wish to engage with services.

Question 4: Should we introduce two routes through to the Carer's Support Plan – at the carer's request and by the local authority making an offer?

 Yes No

Yes, we welcome this suggestion. As integration progresses it may create opportunity for the offer to come from other services

Question 5: Should we remove from statute the wording about the carer's ability to provide care?

 Yes No

The removal of this wording is consistent with Caring Together and EPiC which emphasise the need to focus on carers' outcomes rather than on ability to provide care. The use of 'ability' can be seen as a potential barrier and perception that the carer has to "pass" an assessment. Its removal should improve access to carer support plans.

Question 6: Should we introduce a duty for local authorities to inform the carer of the length of time it is likely to take to receive the Carer's Support Plan and if it exceeds this time, to be advised of the reasons?

Yes

No

We make no comment on the establishment of local authority duties. It is good practice to inform people of how long they can expect to wait before receiving a service therefore we welcome any effort to keep carers informed about the length of time that it may take to develop their support plan. This is consistent with recognising carers as valued and equal partners in care (EPiC core principles). However we are aware that making timeframes a requirement can have unintended consequences when put into practice. It may be that guidance or best practice statement may be more appropriate than establishing a duty.

Question 7: How significant an issue is portability of assessment for service users and carers?

We have no evidence or data to inform a comment on this question

Question 8: Should the Scottish Government and COSLA with relevant interests work together to take forward improvements to the portability of assessment?

Yes

No

We make no comment on this question.

## **Information and Advice**

Question 9: Should we introduce a duty for local authorities to establish and maintain a service for providing people with information and advice relating to the Carer's Support Plan and support for carers and young carers?

Yes

No

We make no comment on the establishment of duties for local authorities. However we would acknowledge that providing people with information and advice relating to Carer's Support Plans is good practice and consistent with the EPiC core principles.

Question 10: Should we repeal section 12 of the Community Care and Health (Scotland) Act 2002 about the submission of Carer information Strategies to Scottish Ministers, subject to reassurances, which are subject in turn to Spending Review decisions, about the continuation of funding to Health Boards for support to carers and young carers?

Yes

No

In context of health and social care integration health boards and local authorities are increasingly producing joint Carer Information Strategies. We support this but acknowledge that there may be concerns about the impact on carers and young carers if designated funding is not continued

### **Support to Carers (other than information and advice)**

Question 11: Should we introduce a duty to support carers and young carers, linked to an eligibility framework?

Yes

No

We make no comment on the establishment of local authority duties. We would note that changing this power from a discretionary one to a duty is likely to have financial and workforce implications. We also consider that decisions related to this issue should take into account the potential impact of SDS legislation

Question 12: Alternatively, should we retain the existing discretionary power to support carers and young carers?

Yes

No

See our answer to the previous question.

Question 13: Should we introduce a duty to provide short breaks?

Yes

No

We make no comment on the establishment of local authority duties.

However we welcome moves to promote the provision of short breaks which is consistent with the EPIC core principles – ‘Carer’s have a life outside of their caring role’. We would suggest the development of good practice guidance to support the workforce to contribute to planning and delivering a range of person-centred short break opportunities in partnership with other agencies.

### **Stages and Transitions**

Question 14: Should we issue statutory guidance on the Carer’s Support Plan which will include guidance for those undertaking the Carer’s Support Plan on managing stages of caring? This would apply to adult carers only. (For young carers, practice guidance will be developed to support management of a Child’s Plan through the stages of caring).

Yes

No

We welcome this proposal which would support the workforce to achieve consistent good practice in relation to Carers' Support Plans. The EPiC core principles include that 'Carers are supported and empowered to manage their caring role' through various translations, including from children's to adult services. We note the need for some flexibility in guidance related to adult, young person and child plans so that decisions/approaches can be based on the needs of individuals rather than at fixed points.

Question 15: Should new carers' legislation provide for young carers to have a Carer's Support Plan if they seem likely to become an adult carer? Any agreed support recorded in the Carer's Support Plan would be put in place after the young carer becomes a (young) adult carer.

Yes       No

This would be consistent with the EPiC core principles, particularly that 'Carers are free from disadvantage or discrimination related to their caring role' which specifically addresses transition of young adult carers between children's and adult services to ensure that they receive continued support. There should be clarity in relation to whose responsibility this would be in the context of integration.

### **Carer Involvement**

Question 16: Should there be carer involvement in the planning, shaping and delivery of services for the people they care for and support for carers in areas outwith the scope of integration?

Yes       No

The need to ensure that carers are fully involved in the planning, shaping and delivery of services is identified in a number of resources including the Carers' Strategy and the EPiC core principles. These proposals are also consistent with the Standards of Best Practice for Engaging Carers developed by the Coalition of Carers in Scotland.

It is acknowledged that ensuring that carers are able to become involved in the planning, shaping and delivery of services remains a challenge for a number of reasons. It requires people at all levels of an organisation to be carer aware and to be able and willing to support carer involvement in different ways. This may require changes in practice and in procedures/processes or structures in order to ensure that the diversity of carers voices is represented

Question 17: Should we make provision for the involvement of carers' organisations in the planning, shaping and delivery of services and support falling outwith the scope of integration?

Yes       No

We are broadly supportive of effective partnership with relevant stakeholders. The national carers organisations were very involved in the development of the EPiC core principles and in the project steering group.

Question 18: Should we establish a principle about carer and young carer involvement in care planning for service users (subject to consent) and support for themselves in areas not covered in existing legislation?

Yes

No

We welcome any moves (subject to consent) to support the involvement of carer and young carers in care planning. It is consistent with the EPiC core principles, particularly 'Carers are recognised and valued as equal partners in care'. It is important that this is supported with workforce development to ensure that involvement is meaningful and takes into account the individual's context, relationships and circumstances. A workforce that is sensitive to carers unique needs and situation and can respond in a skilled and flexible way is key to achieving this aim. During 2014/15 the EPiC project will be developing a new resource which will contribute to supporting the workforce to work with carers as equal partners.

Question 19: What are your views on making provision for young carer involvement in the planning, shaping and delivery of services for cared-for people and support for young carers?

These proposals are consistent with the EPiC core principles. Any arrangements must be age-appropriate and be flexible enough to support young people to become involved in meaningful ways. It may be helpful to look at existing work to guide the establishment of any provision, for example Scotland's Commissioner for Children and Young People (SCCYP) has developed the Golden Rules for Engaging Young Carers and the Young Carer's Authorisation Card is an example of sharing information with young carers.

## Planning and Delivery

Question 20: Should we introduce statutory provision to the effect that a local authority and each relevant Health Board must collaborate and involve relevant organisations and carers in the development of local carers strategies which must be kept under review and updated every three years?

Yes

No

We make no comment on the establishment of statutory provision however the involvement of carers in the development of local carer strategies is consistent with the EPiC core principles.

Question 21: Should we introduce statutory provision to the effect that local authorities with Health Boards must take steps to ensure, in so far as is reasonably practicable, that a sufficient range of services is available for meeting the needs for support to carers and young carers in the area?

Yes

No

We make no comment on whether statutory provisions should be developed. The availability of a sufficient range of services is consistent with the EPiC core principles. The principles also note the importance of ensuring appropriate and accessible services for the diversity of carers, including people living in remote and rural areas, lesbian gay bisexual and transgender people, people from minority ethnic communities and carers with disabilities.

### **Identification**

Question 22: Should there be no legislative provision for GPs or local authorities to maintain a Carers Register in order to support the identification of carers?

Yes

No

We agree that legislative requirements placed on GPs would be challenging and suggest that dissemination of good practice would be more effective. We suggest that steps would be required to monitor that registers of carers were being kept up to date and utilised with the focus being on improving practice rather than penalty.

Question 23: Should the Scottish Government ensure that good practice is widely spread amongst Health Boards about the proactive use of Registers of Carers within GP practices?

Yes

No

As above

Question 24: Should the Scottish Government ask Health Boards to monitor compliance with the core contractual elements of the GP contract?

Yes

No

As above

### **Carer and Cared-for Person(s) in Different Local Authority Areas**

Question 25: What are the views of respondents on the lead local authority for undertaking the Carer's Support Plan and agreeing support to the carer where the carer lives in a different local authority area to the cared-for person(s)?

We make no comment on arrangements between different local authorities but broadly support any move to remove barriers and improve flexibility in carer support and thus improve outcomes for carers and cared-for people.

Question 26: What are the views of respondents on which local authority should cover the costs of support to the carer in these circumstances?

As above

Question 27: Should the Scottish Government with COSLA produce guidance for local authorities?

Yes

No

As above.