

**PROPOSALS FOR PRESCRIBED INFORMATION TO BE INCLUDED IN THE INTEGRATION SCHEME RELATING TO THE PUBLIC BODIES (JOINT WORKING) (SCOTLAND) ACT 2014**

**CONSULTATION QUESTIONS**

1. Do you agree with the prescribed matters to be included in the Integration Scheme?

**Yes**

**No**

2. If no, please explain why:

3. Are there any additional matters that should be included within the regulations?

**Yes**

**No**

4. If yes, please suggest:

5. Are there any further comments you would like to offer on these draft Regulations?

CSP Scotland notes there is one requirement in schemes covering clinical and care governance and 10 covering financial management.

**PROPOSALS FOR PRESCRIBED FUNCTIONS THAT MUST BE DELEGATED BY LOCAL AUTHORITIES RELATING TO THE PUBLIC BODIES (JOINT WORKING) (SCOTLAND) ACT 2014**

**CONSULTATION QUESTIONS**

1. Do you agree with the list of Local Authority functions included here which must be delegated?

Yes

No

2. If no, please explain why:

CSP Scotland maintains that for services to be truly integrated from the point of view of a person using the service, it will be imperative that the requirement to fund adaptations to meet the assessed needs of a person receiving services from the Joint Authority will need to be devolved from the Local Authority.

Falls prevention, for example, is an important aspect of physiotherapy in community settings. Where a simple hand rail can prevent a fall and can be requested by Social Workers, AHPs or support workers, the funding of minor adaptations needs to be devolved to the new joint authority.

Alongside the Allied Health Professions Federation, CSP Scotland calls for specific reference to the provision of equipment and adaptation within the prescribe functions that must be delegated by a Local Authority in the regulation.

3. Are there any further comments you would like to offer on these draft regulations?

**PROPOSALS FOR REGULATIONS PRESCRIBING FUNCTIONS THAT MAY OR THAT MUST BE DELEGATED BY A HEALTH BOARD UNDER THE PUBLIC BODIES (JOINT WORKING) (SCOTLAND) ACT 2014**

**CONSULTATION QUESTIONS**

1. Do you agree with the list of functions (Schedule 1) that may be delegated?

Yes

No

If no, please explain why:

2. Do you agree with the list of services (Schedule 2) that must be delegated as set out in regulations?

Yes

No

If no (i.e. you do not think they include or exclude the right services for Integration Authorities), please explain why:

Alongside the Allied Health Professions Federation (AHPFS), CSP Scotland seeks the inclusion of Wheelchair and Equipment Services in (Schedule 2) under the services that must be delegated. This would sit in line with the existing specialist services e.g. Dialysis Services, Continence Services. Specific mention should be made of allied health professions, including physiotherapists and paramedics, under 'Unplanned Inpatients' and 'Outpatients – Accident and Emergency'.

3. Are you clear what is meant by the services listed in Schedule 2 (as described in Annex A)?

**Yes**

**No**

If not, we would welcome your feedback below to ensure we can provide the best description possible of these services, where they may not be applied consistently in practice.

- In the table (and in the regulations themselves): Under 'Pharmaceutical services - GP prescribing' - the professions listed are 'GPs, nurse prescribers, prescribing pharmacists working in GP practices' and that they 'provide the full range of prescribing services set out in legislation and guidance'.

CSP Scotland is concerned that the table does not reflect the statutory independent prescribing rights of physiotherapists and podiatrists in Scotland and the future development of prescribing across a wider range of AHPs.

4. Are there any further comments you would like to offer on these draft regulations?

Whilst it is recognised that under the regulations that 'integration must include all adult provision; inclusion of children's services in integrated arrangements is left to the discretion of local partners', However, clear guidance on transitional arrangements between adult and child services must be required where those services are not jointly included in local integration agendas.



**PROPOSALS FOR NATIONAL HEALTH AND WELLBEING  
OUTCOMES RELATING TO THE PUBLIC BODIES (JOINT  
WORKING) (SCOTLAND) ACT 2014**

**CONSULTATION QUESTIONS**

1. Do you agree with the prescribed National Health and Wellbeing Outcomes?

Yes

No

If no, please explain why:

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2. Do you agree that they cover the right areas?

Yes

No

3. If not, which additional areas do you think should be covered by the Outcomes?

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4. Do you think that the National Health and Wellbeing Outcomes will be understood by users of services, as well as those planning and delivering them?

Yes

No

5. If not , why not?

See comment above regarding the interpretation of **Outcome 2.**

6. Are there any further comments you would like to offer on these draft Regulations?