

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

Citizens Advice Scotland (CAS), our 61 member bureaux and the Citizen Advice Consumer Service helpline form Scotland's largest independent advice network. Advice provided by the Scottish CAB Service is free, independent, confidential, impartial and available to everyone. Our website, Adviceguide, also provides the public with up to date information on a range of topics. We are champions for both citizens and consumers and in 2012/13 we helped over 314,000 people deal with over a million issues.

The Citizens Advice Service aims to ensure that individuals do not suffer through lack of knowledge of their rights and responsibilities or of the services available to them or through an inability to express their needs effectively.

The Patient Advice and Support Service (PASS) is delivered by the Scottish CAB Service. The service is independent and provides free, confidential information, advice and support to anyone who uses the NHS in Scotland. It aims to support patients, their carers and families in their dealings with the NHS and in other matters affecting their health. The service promotes an awareness and understanding of the rights and responsibilities of patients. It also advises and supports people who wish to give feedback, make comments, raise concerns or make a complaint about treatment and care provided by the NHS in Scotland.

CAS recommends that both integration joint boards and joint monitoring committees should have to include third sector representatives and user and carer representatives regardless of the structure or section of the Act under which they are formed. Equally, CAS recommends that the integration joint board arrangements and joint monitoring committees for representation on joint boards should include representatives of carers, service users and the third sector regardless of whether there is only one council or more in the Health Board area.

CAS recommends that the arrangements relating to performance targets, improvement measures, and reporting arrangements should include arrangements for promotion of progress and the provision of monitoring reports to the general public, as Health Boards do now for complaints. CAS requests that any consultation in development integrations scheme includes key parties such as the Scottish CAB service, and in particular, third sector organisations who are service delivery partners.

CAS feels very strongly that plans for workforce development should include training relating to the handling of feedback, comments, concerns and complaints, and how to use relevant systems and procedures including the Patient Advice and Support Service delivered by the Scottish CAB Service. CAS suggests that there is separate training for staff transferring from council to NHS and also for those transferring from the NHS into the council. Regarding "Complaints in relation to services provided in pursuance of integration functions" there is currently input from the Scottish CAB service around NHS complaints from the Patient Advice and Support Service and

there is a need for transparent processes in relation to handling of claims against the council or NHS. As part of this, there will also need to be arrangements for sharing of data (when this relates to patients).

ANNEX 3

The establishment of the Patient Advice and Support Service was specified in the Patient Rights (Scotland) Act 2011. As this Act is one of those identified for inclusion in the transfer of functions between health boards and local authorities, there is an absolute requirement to consider the potential implications for the Patient Advice and Support Service in terms of integrated functions. The implications may include:

- The need for re-branding. The emphasis at present is on 'patients'. With integration, the NHS may take over control of non-medical adult care services which have users, customers or clients rather than 'patients', as is the case in NHS Highland where integration has already taken place. Users may not realise that PASS applies to them and may therefore have difficulty in accessing appropriate complaints procedures.
- The need for marketing of PASS to services which are (or have been) taken over by the NHS to ensure that users and staff are aware of the complaints procedures to be followed, the support that is available through PASS, etc.
- Staff training and awareness raising for CAB Advisers and Patient Advisers but also for staff working in new NHS structures and services. This will need to cover existing complaints procedures (NHS, local authority, social work and Care Inspectorate); which to apply and when; up-coming changes to these as regulations are amended; good practice, etc.
- Possible changes in statistical recording procedures and practices
- Possible changes in local reporting arrangements, advisory group membership and communications with statutory bodies
- The need for local PASS services to extend the range of groups and organisations with which they work in partnership, take referral, etc.
- Capacity of PASS to deal with additional client numbers/complaints
- CAS would welcome early discussions with the Scottish Government/NHS Scotland about how best to tackle PASS related issues, particularly as any change of name would require regulation, as the name is currently enshrined in the Patient Rights (Scotland) Act.
- CAS would welcome clarification about future contractual arrangements for PASS delivery across Scotland, given that local arrangements may, in future, be made with agencies other than the NHS.

ANNEX 4

The advice and support that Citizens Advice Bureaux offer clients means that they contribute to Outcomes 1 to 7. In particular, in relation to Outcome 3, by supporting people in their dealings with the NHS, the Patient Advice and Support Service ensures that where people do not have a positive experience with the NHS, they are given information, advice and support to tell the NHS this, with the aim of improving services and ensuring that other patients have more positive experience of the service.

In relation to Outcome 4, being delivered by the Scottish CAB service means that PASS is able to offer a holistic service where people are able to receive information, advice and support about a wide range of issues which may be affecting their lives from the same place. This can help individuals to “maintain or improve the quality of life of service users” thereby meeting the outcomes covered by this Act. One CAB manager commented that the added value of PASS being delivered by the Scottish CAB Service is “the resources within bureau which enable us to provide a one-stop shop regarding benefits, debt, housing and relationship issues. For example in a recent case of a ... man who had been diagnosed with a terminal illness, we could deal with his NHS issues sensitively and quickly and assist with accessing benefits during the same appointment which made it an easier experience for him and his distraught family.” (from PASS Service Review, available upon requests from Citizens Advice Scotland).

In relation to Outcomes 1, 2, and 5 to 7, the values and principles of the Scottish CAB Service include empowerment and the provision of a generalist service, detailed below.

Empowerment

Bureaux seek to assist clients to help themselves. Bureaux help clients to understand their situation, to decide which course of action to adopt and to take steps themselves to tackle their problems. Bureaux aim to ensure that each client has the experience and satisfaction of self help.

A generalist service

Bureaux provide information, advice and assistance on any topic; no one calling at a Citizens Advice Bureau will be turned away because it does not deal with that type of problem. Because bureaux provide a generalist service, they can deal successfully with problems or groups of related problems that do not completely fit within the field of a single, specialist source of help. Where bureaux do not supplement this generalist service with appropriate specialisms, clients will be put in touch with specialists as required and where possible.¹

Independent research has shown that the provision of CAB services and CAB interventions actively contribute to improvements in people’s health and well-being and quality of life; ability to cope with illness and disability; and ability to live independently for longer. CAB services also make contributions to reductions in health inequalities. This is achieved because CAB clients benefit from higher incomes, reduced stress and anxiety, improved ability to manage money and avoid indebtedness, being able to remain in their own homes and avoid homelessness, having access to statutory and non-statutory support services, and feeling more confident and able to cope.

CAS believe it is vital that the outcomes include evidence collected by PASS, and other similar support services, regarding monitoring and involve third sector organisations in promoting and supporting them. CAS’s major role in this relates to outcomes and evidence. It may be possible for Citizens Advice Bureaux to survey PASS clients about outcomes 1 to 4, and maybe carers. To do this effectively, the Scottish CAB service would need to be adequately resourced.

¹ www.cas.org.uk/about-us/about-bureaux/our-values-and-principles

Monitoring, measurement and evaluation of achievement against outcomes is vital as are the delegated/contracted functions. CAS would like clarification on whether PASS would be included in this and also on what actions will be taken and by whom if outcomes are not achieved.

The Scottish Government will need to consider contractual issues relating to the national and regional delivery of the Patient Advice and Support Service, and related procurement activities. It seems unlikely that local delivery of PASS will continue only to be in partnership with the NHS as local authorities will also be delivering health related services. The Scottish Government will need to consider whether or not PASS remit should be extended to include some council services, for example, whether health services paid for by the NHS but delivered by the Council continue to fall under the remit of NHS complaints and therefore be supported by PASS. CAS's view is that they should.

CAS requests clarification about why support homes for people with learning difficulties aren't included in this section when these services are mentioned elsewhere in the regulations.