

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:

There is no mention of staff governance standards and consideration should be given to including a requirement for staff governance arrangements to be included in the integration schedule.

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

It is suggested that sections covering information governance and information sharing should cover not only individual level information sharing for the purpose of health and social care but should also clarify aggregate information sharing for wider groups.

ANNEX 2(D)

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:

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

No further comments.

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:

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.

Clarification is required in relation to what is meant by “Health Promotion”. In particular if this is intended to include what is often described as specialist health promotion services which are currently part of Public Health Departments in many NHS Boards.

Clarification is required on what is meant by “Women’s Health Services”. For instance is the reference to “sexual health” meant to apply to all services rather than women only. In addition there is no mention of Pharmacists and yet the national pharmacy contract includes the provision of emergency hormonal contraception by Community Pharmacists.

The description “Pharmaceutical services – GP prescribing” requires clarification. Strictly speaking GP prescribing is not a “pharmaceutical service”. The dispensing of prescriptions written by GPs and others, unless from a dispensing GP practice, is a pharmaceutical service provided by Pharmacists under the terms of the pharmacy national contract.

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

The rationale for inclusion of Home Dialysis in the list of services which must be included requires explanation. This would normally be considered as part of an integrated renal service.

Independent pharmacy prescribers are only referred to in the regulations (Schedule 2) as working in GP practices, whereas independent pharmacy prescribing clinics are being provided in a range of settings including from community pharmacies. Recognition of the variety of primary healthcare professional services being provided from settings other than GP practices should be recognised.

**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:

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?

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?

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

The national outcomes will require to be supported by measurable indicators if they are to have the intended impact.

They need to be explained in plain language with no assumptions about prior knowledge.

It has to be acknowledged that it will take time for all parties to become familiar with the new system and its outcome focused objectives.

Several comments have been received within the Board that in general terms, the links between the Partnerships and acute hospital services could be strengthened. It may be worth considering a further outcome along the lines of, "People who require health services that are only available in the hospital setting are able to access these services timeously and are able to return to their home or homely setting safely, appropriately supported, and as quickly as possible." It is appreciated that this may blur lines of accountability but perhaps joint accountability in this area may be appropriate.

**PROPOSALS FOR INTERPRETATION OF WHAT IS MEANT BY THE
TERMS HEALTH AND SOCIAL CARE PROFESSIONALS RELATING
TO THE PUBLIC BODIES (JOINT WORKING) (SCOTLAND) ACT 2014**

CONSULTATION QUESTIONS

1. Do you agree that the groups listed in section 2 of the draft regulations prescribe what 'health professional' means for the purposes of the Act?

Yes

No

2. If you answered 'no', please explain why:

3. Do you agree that identifying Social Workers and Social Service Workers through registration with the Scottish Social Services Commission is the most appropriate way of defining Social Care Professionals, for the purposes of the Act?

Yes

No

4. If you answered 'no', what other methods of identifying professional would you see as appropriate?

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

**PRESCRIBED FUNCTIONS CONFERRED ON A LOCAL AUTHORITY OFFICER
RELATING TO THE PUBLIC BODIES (JOINT WORKING) (SCOTLAND) ACT
2014**

CONSULTATION QUESTIONS

1. Do you believe that the draft Regulations will effectively achieve the policy intention of the Act?

Yes

No

2. If not, which part of the draft Regulations do you believe may not effectively achieve the policy intention of the Act, and why?

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

Although not related to this specific draft Regulation, the Board would offer two additional general comments:

- it would be helpful to have a clearer link to expectations around tackling inequalities and the relationship between Health and Social Care Partnerships and Community Planning Partnerships; and
- the draft Regulations will not achieve the policy intention of the Act alone. They should form a framework within which there is room for local flexibility and exercising of effective local leadership at all levels.