

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?

AHPFS note 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:

The AHPFS would also like to highlight the Scottish Governments Guidance on the provision of adaptations and equipment.

http://www.sehd.scot.nhs.uk/publications/CC2009_05.pdf

Although many local authorities and health boards already share equipment stores for the joint provisioning of equipment for people with disabilities there is no reference within the regulations of equipment in this regard.

The AHPFS is calling 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:

The AHPFS would request 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 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	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>

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: Under AHPs - there is insufficient definition of the work that we do - the table states: 'To provide assessment, investigation, diagnosis, care planning and treatment of patients'.

The AHPFS would advocate the extension of the definition '**What does the service involve**' to include 'across a full range of physiological and psychological services'.

In the table: Under Health Promotion '**Where is the service delivered?**' the AHPFS would suggest that 'hospitals' should be included as hospital based AHPs may discuss aspects of health promotion with patients as this sits within the potential developments under the AHP National Delivery Plan.

- 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'.

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', the AHPFS believes that there should be clear guidance on transitional arrangements between adult and child services 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:

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?

See comment above regarding the interpretation of Outcome 2.

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

The AHPFS appreciates the growing recognition of the integral role that AHPs play across all health and social care provision. Current models of service delivery and future AHP service design and implementation as outlined in the AHP National Delivery Plan can facilitate more effective use of all health and social care resources across all sectors of health and social care provision.

The AHPFS would request further details if agreement cannot be reached on bullet point 5 in the Explanatory note (not part of the regulations) regarding the process whereby the constituent authorities making up the integration joint boards can 'jointly require the strategic plan to be replaced if it prevents or is likely to prevent either of them from carrying out their functions in a way which contributed to achieving the outcomes (section 38(2)).

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:

	(s) of those required by anyone in care differ from the current definition of health care professionals.
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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?

	support from local authorities but quite different to the current definition of health care professionals.
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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?

For this Act to fulfil its potential for greater integration across health and social care, the AHPFS believes that where a lead agency under the NHS or Corporate body is adopted, consideration of additional peripheral but integral local authority services may need to be considered i.e. housing, transport and infrastructure.