



**The British
Psychological Society**
Promoting excellence in psychology

British Psychological Society response to the Scottish Government

Proposals for prescribed information to be included in the Integration Scheme relating to the Public Bodies (Joint Working) (Scotland) Act 2014

About the Society

The British Psychological Society, incorporated by Royal Charter, is the learned and professional body for psychologists in the United Kingdom. We are a registered charity with a total membership of just over 50,000.

Under its Royal Charter, the objective of the British Psychological Society is "to promote the advancement and diffusion of the knowledge of psychology pure and applied and especially to promote the efficiency and usefulness of members by setting up a high standard of professional education and knowledge". We are committed to providing and disseminating evidence-based expertise and advice, engaging with policy and decision makers, and promoting the highest standards in learning and teaching, professional practice and research.

The British Psychological Society is an examining body granting certificates and diplomas in specialist areas of professional applied psychology.

Publication and Queries

We are content for our response, as well as our name and address, to be made public. We are also content for the Scottish Government to contact us in the future in relation to this inquiry. Please direct all queries to:-

Joe Liardet, Policy Advice Administrator (Consultations)
The British Psychological Society, 48 Princess Road East, Leicester, LE1 7DR
Email: consult@bps.org.uk Tel: 0116 252 9936

About this Response

This response was led for the British Psychological Society by:

Dr Ruth Stocks CPsychol, Division of Clinical Psychology and Division of Forensic Psychology

With contributions from:

Hannah Dale CPsychol, Division of Health Psychology

We hope that you find our comments useful.

David J Murphy CPsychol
Chair, Professional Practice Board

ANNEX 1(D)

PRESCRIBED GROUPS WHICH MUST BE CONSULTED WHEN PREPARING OR REVISING INTEGRATION SCHEMES; PREPARING DRAFT STRATEGIC PLANS; AND WHEN MAKING DECISIONS AFFECTING LOCALITIES RELATING TO THE PUBLIC BODIES (JOINT WORKING) (SCOTLAND) ACT 2014

CONSULTATION QUESTIONS

1. Do these draft Regulations include the right groups of people?

Yes

No

2. If no, what other groups should be included within the draft Regulations?

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

We believe that all psychology staff should be consulted when Boards are preparing or revising integration schemes; preparing draft strategic plans; and when making decisions affecting localities relating to the Public Bodies (Joint Working) (Scotland) Act 2014, the Society would welcome guidance attached to the legislation directing Boards to consult with their Area Psychology Committee. Although not well-established in each Board area, these committees represent the full range of practitioner psychology staff (Clinical, Counselling, Educational, Forensic, Health, Occupational, Sport and Exercise Psychologists) at all levels of the Agenda For Change system, as well as non-regulated psychology staff, such as Assistant Psychologists and Clinical Associates in Applied Psychology, employed by the Board.

ANNEX 2(D)

MEMBERSHIP, POWERS AND PROCEEDINGS OF INTEGRATION JOINT BOARDS ESTABLISHED UNDER THE PUBLIC BODIES (JOINT WORKING) (SCOTLAND) ACT 2014

CONSULTATION QUESTIONS

1. Are there any additional non-voting members who should be included in the Integration Joint Board?

Yes

No

2. If you answered 'yes', please list those you feel should be included:

The Society is concerned that sufficient emphasis may not be placed on mental health unless there are members from this field appointed to the Board. The presence of a single Medical Director or Clinical Director, as currently stipulated, does not ensure this.

3. Are there any other areas related to the operation of the Integration Joint Board that should also covered by this draft Order?

4. Are there any further comments you would like to offer on this draft Order?

ANNEX 3(D)

ESTABLISHMENT, MEMBERSHIP AND PROCEEDINGS OF INTEGRATION JOINT MONITORING COMMITTEES ESTABLISHED UNDER THE PUBLIC BODIES (JOINT WORKING) (SCOTLAND) ACT 2014

Consultation Questions

1. Do you agree with the proposed minimum membership of the integration joint monitoring committee, as set out in the draft Order?

Yes

No

2. If you answered 'no', please list those you feel should be included:

As it stands, the Joint Monitoring Committee is to include at least one representative healthcare professional, but that person may not have the competences to advise on aspects of mental health care which are vital to improving quality. The Society, therefore, recommends that the Scottish Government should stipulate that a larger number of healthcare professionals are appointed to the Integration Joint Monitoring Committee, and to ensure that there is appropriate expertise to advise on mental health indicators, particularly in relation to the selection of measures and interpretation of findings, from a non-medical perspective, as well as to advise on the most up-to-date psychological approaches relating to patient safety. Practitioner psychologists would be well-placed to do this.

3. Are there any other areas related to the operation of the integration joint monitoring committee that should also covered by the draft Order?

4. Are there any further comments you would like to offer on this draft Order?

**PRESCRIBED MEMBERSHIP OF STRATEGIC PLANNING GROUPS
ESTABLISHED UNDER THE PUBLIC BODIES (JOINT WORKING) (SCOTLAND)
ACT 2014**

CONSULTATION QUESTIONS

1. The draft Regulations prescribe the groups of people that should be represented on the strategic planning group. Do you think the groups of people listed are the right set of people that need to be represented on the strategic planning group?

Yes

No

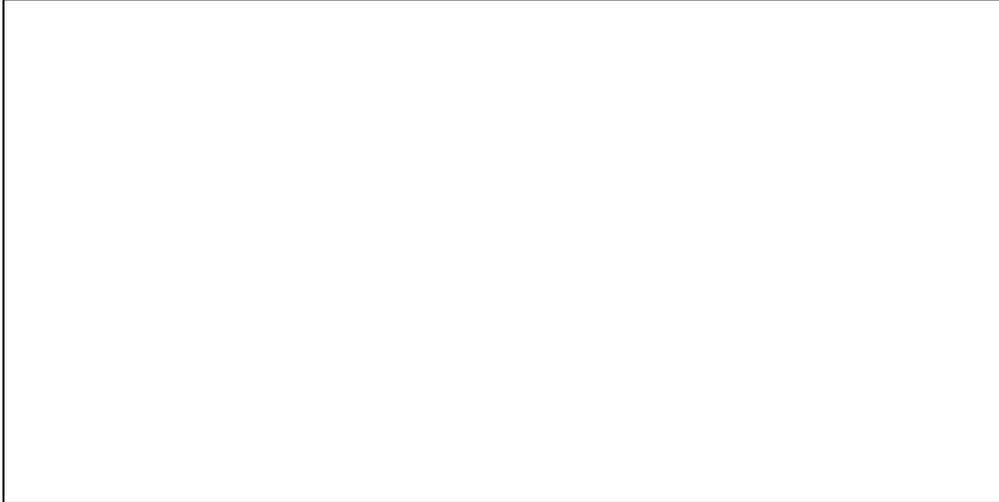
2. If no, what changes would you propose?

'Integration' presents an opportunity for much needed healthcare reform, towards a more holistic approach which takes account of a person's physical and psychological needs in the context of their personal and social circumstances. Such an approach is popular with users and leads to better outcomes and financial savings, e.g. by reducing hospital admissions, increasing time to relapse and improving self-management of long-term conditions. However, the proposed legislation runs the risk of simply providing a smoother interface between two systems addressing 'separate' needs, without attempting to weave interventions together to address a person's needs as a whole. More inclusive representation on the Strategic Planning Groups could help to overcome this.

As it stands, Strategic Planning Groups are to include at least one representative healthcare professional. While this may seem to offer the possibility of appointing staff from any professional background, traditionally, representatives on the most senior bodies are almost exclusively 'medical' professionals, such as doctors and nurses, who cannot be considered properly representative of all healthcare professionals. In addition, without the presence of staff who can present alternative models of mental health care, the predominance of the medical model is likely to go unchallenged.

The Society, therefore, recommends that the Scottish Government stipulates that a wide range of healthcare professionals are appointed to the Integration Joint Monitoring Committee, such that there is an appropriate focus on holistic approaches to mental health care and that all healthcare professionals are properly represented.

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

A large, empty rectangular box with a thin black border, intended for the user to provide comments on the draft regulations.

**PRESCRIBED FORM AND CONTENT OF PERFORMANCE REPORTS
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 performance report?

Yes

No

2. If no, please explain why:

3. Are there any additional matters you think should be prescribed in the performance report?

Yes

No

4. If yes, please tell us which additional matters should be prescribed and why:

The Society would welcome information on complaints and serious incidents included.

5. Should Scottish Ministers prescribe the form that annual performance reports should take?

Yes

No

6. If you answered yes, what form should Scottish Ministers prescribe?

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