

# Alzheimer Scotland

## Public Bodies (Joint Working) (Scotland) Act 2014 – Regulations – Set Two

### Introduction

Alzheimer Scotland is Scotland's leading dementia voluntary organisation. We work to improve the lives of everyone affected by dementia through our campaigning work nationally and locally and through facilitating the involvement of people with dementia and carers in getting their views and experiences heard. We provide specialist and personalised services to people with dementia, their families and carers in over 60 locations and offer information and support through our 24 hour freephone Dementia Helpline, our website ([www.alzscot.org](http://www.alzscot.org)) and our wide range of publications. We welcome the opportunity to respond to this consultation and to take part in developing the integration agenda as it progresses.

Alzheimer Scotland believes that an easy-read version of the consultation would have been of value as consultation documents of this length and complexity are, in our experience, often a potential barrier to people who use services and their carers participating in the development of legislation directly related to their interests.

### Representation – General Comments

Throughout the regulations, provision is made to ensure that third sector organisations, carers and people who use services are represented on integration joint boards, integration joint monitoring committees and strategic planning groups. Whilst this is welcome, we encourage the Scottish Government to publish further guidance or regulations on what is expected of the representatives, as we are concerned that an individual may face challenges in adequately representing the views of the diverse range of organisations and people.

In order to ensure that the functions of the integrated authorities and their respective committees are executed effectively, training should be provided, as needed, for all group members to enable them to contribute, with particular attention given to the training needs of 'lay' members of the group, carers and people who use services. Furthermore, consideration should be given to the support needs of group members, particularly those not attending in a professional capacity, to enable them to fully participate; this might include integrated authorities creating additional support provision for people cared for by group members.

Alzheimer Scotland understands that the Third Sector may be represented in the integration joint boards, integration joint monitoring committees and strategic planning groups by local Third Sector Interfaces. We encourage the Scottish Government to issue regulations or guidance setting out the obligations of the representatives, including the need to consult broadly and meet with the groups they represent, to ensure that their opinions and expertise are accurately represented.

We welcome the flexibility of the regulations in allowing integrated authorities to appoint other members where they see fit and believe that this will allow organisations and individuals with issue-specific knowledge and expertise to inform the work of the integration authority. Direction is necessary on whether the integrated authority can make temporary appointments on an ‘as required’ basis, especially when addressing a specific health or social care matter.

Alzheimer Scotland believes that participation and involvement of GPs within the emerging integrated authorities will be a crucial to the success of the policy aims of integration. We recommend that greater reference and inclusion of GPs within the document, as they are only mentioned in relation to the Strategic Planning Groups. During the passage of the Bill at the Stage Three, the Cabinet Secretary for Health and Wellbeing noted that:

*“I agree about the importance of GP involvement, particularly in localities and partnerships themselves”, [Official Report, 25 February 2014; c 28154].*

We therefore recommend the Scottish Government to provide greater clarity on the way in which integration joint boards and integration joint monitoring committees should engage with GPs within their localities, to ensure their participation.

### **Prescribed groups which must be consulted when preparing or revising Integration Schemes; preparing draft strategic plans; and when making decisions affecting localities**

Alzheimer Scotland suggests that the regulations should make provisions for the way in which consultations should be conducted. We believe that, in keeping with the policy objectives of integration, regulations should require all integration authorities to conduct consultations in such a way that takes into consideration the needs and circumstances of people who use services, their families and carers. This could take the form of easy-read documents, focus groups and other consultative methods to maximise ways to participate.

### **Membership, powers and proceedings of Integration Joint Boards**

Alzheimer Scotland broadly agrees with the proposed membership of the Integration Joint Boards. However, we believe that the regulations should also specify the inclusion of both GPs and the independent sector on the non-voting advisory membership. We note that the regulations require a “registered health professional employed and nominated by the Health Board” but are uncertain as to whether this could include a GP as they are “contracted” through the health boards. The regulations should ensure that this is made clear.

In the introduction to the legislation, two of the stated policy intentions of the regulations are:

- *To provide seamless, joined up, quality health and social care services in order to care for people in their homes, or a homely setting, where it is safe to do so.*

- *To ensure resources are used effectively and efficiently to deliver services that meet the increasing number of people with longer term and often complex needs, many of whom are older.*

We are concerned that the Standing Orders, as set out in the Statutory Instruments, allow for a meeting to be called with only a three day notice period. Whilst this is likely to only be used in exceptional circumstances, we consider this to be an insufficient notice period, particularly for people who use services and carers who may be unable to make arrangements on such short notice, thereby restricting their ability to participate in the meeting. The guidance must make clear that the maximum possible notice must be provided, with any notice period less than 21 days being subject to a published explanation and justification.

Alzheimer Scotland also has these concerns for integration joint monitoring committees.

### **Establishment, membership and proceedings of integration joint monitoring committees**

Alzheimer Scotland supports the Scottish Government's intention to issue guidance on the most appropriate way of recruiting representatives of people who use services, carers and the third sector and which key groups should be involved. We further believe that this guidance should advise integrated authorities on the best ways to involve people who use services and their carers to ensure that their participation is meaningful and that the meetings of the integrated bodies accommodate any specific needs. The regulation and any accompanying statutory guidance must provide further detail on this. We offer our assistance in the development of such guidance.

We are unclear as to why this intention was stated under the integration joint monitoring committee section only, with no equivalent in the integration joint boards section. Please provide clarification on this point and provide assurance that this guidance will also be issued to integration boards or that equivalent guidance will be issued.

### **Prescribed membership of strategic planning groups**

Alzheimer Scotland welcomes the regulations requiring Integration Authorities, as part of the strategic planning process, to:

- Embed people who use services and their carers in the decision making process.
- Treat the third and independent sectors as key partners.
- Involve GPs, other clinicians and social care professionals in all stages of the planning work from the initial stages to the final draft.

### **Prescribed form and content of performance reports**

We believe that people who use services, their families and carers should have access to all information relating to the provision and performance of services that are relevant to their interests. Alzheimer Scotland therefore recommends that the Scottish Government establish regulations which mandate that integration authorities publish the reports in such a way that takes into consideration the needs and circumstances of people who use services, their families and carers and maximises the accessibility of the reports.

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