

## **Royal National Institute of Blind People (RNIB) Scotland Response to Draft Regulations Relating to Public Bodies (Joint Working)(Scotland) Act 2014 – Set 2**

RNIB Scotland welcomes the opportunity to respond to this consultation and to support the principle underpinning the integration of health and social care.

As the leading charity for blind and partially sighted people living in Scotland and a major partner with a range of integrated eye-care and sensory services, we support those living with a sensory impairment to live full and independent lives.

RNIB Scotland recognises that strong and effective partnership must be at the heart of driving better outcomes for the people of Scotland. We believe that the guidance which accompanies the regulations will be critical in how the regulations are interpreted and applied. The guidance must reflect the cultural shift being sought in relation to health and social care and begin from a strong rights and asset based perspective. This is key to driving forward health and social care that is; person-centred; based on assets within communities and that brings together an equal partnership among statutory, third and independent sectors, alongside those who use support and services.

### **ANNEX 1(D)**

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#### **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?

RNIB Scotland welcomes the opportunity to comment on the prescribed groups which must be consulted when preparing or revising integration schemes.

We believe the list encompasses those groups who should be consulted in the process of developing integration schemes and we welcome the inclusion of people who use support and services and un-paid carers. We also feel that there needs to be a degree of local flexibility permitted in this process. This would allow partnerships to consult in a manner which is most appropriate to local structures and local needs.

We would like to see more detail around the following areas:

**Participation and Engagement:** There is a requirement for participant and engagement exercises to be built around participative approaches and not solely representative models. The equalities and health inequalities dimensions to participation and engagement also needs to be considered. People who use services and unpaid carers will require support to participate effectively, meaningfully and usefully in the strategic planning process.

Whilst a prescribed approach to participation and engagement cannot be provided for each Partnership; there should be principles and standards set out to ensure consistency of approach.

**Third Sector Engagement:** The third sector will require adequate investment to enable the time and resources to engage with partners across a growing number of policy areas.

**Resources:** Resources encompass more than financial assets and strategic planning must be supported by mapping of community assets in each locality. Integration schemes need to ensure that those who have the greatest resources (and therefore often make their voices heard) do not influence the strategic commissioning process, which may result in maintaining or widening health inequalities.

**Locality Planning:** Strong locality planning arrangements offer a real opportunity, particularly for the third sector which can play an important role in engaging with the wider public. The third sector have good experience and are able to make the most of community assets, moving towards the development of planning processes which focus on delivering better outcomes.

**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  Y

No

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

In relation to the proceedings of the Integration Boards, clarity is required on how non-voting members will be supported to engage effectively and meaningfully as both valued and equal members of the Boards. This clarity and guidance needs to include the provision of accessible information provided well in advance of meeting dates to that full participation is possible; including alternative formats appropriate to the needs and requirements of those on the Board.

There is set to be a significant change in the demographics of Scotland. A growth in the ageing population will see a change in the dependency ratios across Scotland and we will see an increase the prevalence of many health conditions as a result, including sight loss, which is set to double from around 180,000 people to 400,000 by 2031.

The ethnic diversity within Scotland has also changed considerably over the last decade, with predictions that this is set to continue. The size of the minority ethnic population in 2011 was just over 200,000 or 4 per cent of the total population of Scotland; this has doubled since 2001. It is important to note that ethnic minority populations are often concentrated within different geographic locations, for example, 12 per cent of Glasgow City's population are from a black or ethnic minority group.

On reflection of the changes within the Scottish population and the changes we are likely to see, Integration Boards should give serious consideration to the flexibility applied to who can be included as non-voting members and whether additional members can be invited to join in the future. This consideration should reflect local needs and populations.

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?

**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:

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?

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

The Strategic plans that will be developed by Health and Social Care Partnerships will be critical in achieving health and social care integration. To ensure that the strategic commissioning processes and their effectiveness to achieve the outcomes set out is possible, people who use services and unpaid carers will require support to participate effectively, meaningfully and usefully in the strategic planning process. Whilst a prescribed approach to participation and engagement cannot be provided for each Partnership; there should be principles and standards set out to ensure consistency of approach.

The third sector will also require adequate investment to enable the time and resources to engage with partners across a growing number of policy areas.

**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:

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?