

CONSULTATION QUESTIONS

Question 1

What aspects of the current ILF worked well and what elements did not work so well?

ENABLE Scotland members and the people we support report that the ILF worked well for those people who had access to the fund. Recipients of the ILF could use the additional funding to adapt in detail their services to their own lives and the lives of their families. This flexibility had far reaching advantages by allowing people to make better use of facilities, go to work and do many of the things that people without a disability take for granted. The fund also allowed many carers to maintain employment as well as providing a crucial form of short breaks for the person with a disability and for family carers.

Families of people with learning disability who were in receipt of ILF consistently refer to the choice and control about how ILF funding could be spent and compared this to Local authority funding which is reported to be more restricted and less flexible. This appears to be the perception even within those local authorities implementing SDS. The strongest positive aspect of ILF funding relates to those principles that Self Directed Support purports to promote. However no one consulted suggested that the implementation of SDS weakened the need for ILF funding

The most significant negative aspect of the Independent Living Fund is that it has created a two tier of service provision with the fund being closed to new applicants, regardless of need. It also seems that access and use of the ILF throughout Scotland is patchy at best, with more reported access to ILF monies in some local authorities, and far less in others.

Question 2

Should the money that becomes available after existing ILF recipients no longer need it be used in the same way for others in the future? If so, why? If not, how else might the money be used?

No. ENABLE Scotland believes that money which becomes available after existing ILF recipients no longer need it should be used differently. However, ENABLE Scotland feels strongly that existing users should be protected. Existing users have developed lifestyles which are as rich and meaning full as they can be using ILF funding and the removal of this would be devastating for current recipients and their families.

Alongside this, however, we must recognise that the Independent Living Fund exists due to gaps in existing service provision. It is important in the longer term that the Scottish Government recognises and challenges this – and uses any additional funding to address this in partnership with local planning mechanisms.

In order to protect existing users and to challenge the existing gaps in

service provision, ENABLE Scotland believes that there is a need for a distinct body to exist to promote the concept of independent living by allocating Independent Living Fund monies to encourage innovative ways of supporting individuals as part of their local communities.

We recognise that any money that becomes available through attrition will not be an adequate amount to provide the same level of assistance that the Independent Living Fund has in the past without severely limiting the number of new entrants. It is for this reason that we would like to see any funds that become available through attrition used in a more strategic fashion to develop infrastructure initiatives and community based projects, services and support that promote independent living.

We believe that there is a need for a new Trust making body to work with health and social care partners to ensure that the principals of independent living are being promoted across Scotland. A national organisation operating at a strategic level would be able to identify and promote best practice across various stakeholder organisations such as Local Authorities, the NHS, transport providers as well as the voluntary and private sector.

This new Trust would also be able to use funding gained through attrition to directly fund projects which are models of good practice in the promotion of independent living. We detail more about how this should operate in our answer to Question 6 below.

Question 3

If the available resource is simply that which is transferred from the Treasury, how would you like to see it used if it was not to be a continuation of the existing approach?

ENABLE Scotland feel that with any resource that the first priority must be to protect existing users.

As we have previously stated, ENABLE Scotland would like to see the creation of a new trust to administer the fund for the protection of current users and to operate on a strategic basis in the longer term to monitor and promote the concept of independent living utilising funding which becomes available through attrition.

This new trust would have a monitoring and advisory role as well as directly funding projects which show best practice in the concept of independent living.

Comments

Question 4

What innovative ways might there be for increasing the overall amount of money in the pot?

In order to increase the funds available to promote the delivery of effective best practice projects at local level, partnerships could be created with other stakeholders such as the NHS or Local Authorities.

The Trust could also be set up in such a way as to allow it to apply to other sources for funding.

Question 5

With any available resource, where is the most effective area to target resources which can have the biggest impact on an individual's ability to live more independently?

ENABLE Scotland members who receive ILF funding state clearly that the biggest impact on living independently is being able to make decisions about support and about flexibility in that support. Families feel enabled to support their relative at home for longer if the support is tailored to the exact requirements of the whole family.

Accessibility is also a key feature of living independently according to our members. Accessibility to public places, public transport and universal services all facilitates independent living. Both these areas inform our response to this consultation and strongly suggest that the most effective area to target resources to aid independent living is by directly allowing service users' the funds to organise their own support.

The most effective solution would be to expand the independent living fund in its current format to take in all those individuals who would benefit from it or to ensure that the implementation of SDS replicates the keys principles of ILF.

ENABLE Scotland supports the development of a new Trust operating on a strategic level nationally informing the development of infrastructural developments, effective practice and support to promote independent living

Question 6

Once funding has been devolved to the Scottish Government, which option do you think will be most appropriate for Scotland?

ENABLE Scotland members feel strongly that a separate fund must exist to meet the very specific needs of existing Independent Living Fund users. There is great concern amongst our members that any money passed to the local authorities would be used to fix budgetary problems in other areas and this would result in ILF users losing out.

ENABLE Scotland therefore recommends that a national scheme be put in operation to administer the fund and recommends that option 4 is the best option to achieve this.

ENABLE Scotland propose the establishment of a new trust set up to

administer ILF. This new body would administrate both the fund for current users but also strategically administer any funds which become available over time through funding the development of local projects which support disabled people to exercise choice, dignity and control over the lives they lead as part of their local communities.

This new body would also have an over arching goal of the promotion of independent living and monitor Local Authorities and other stakeholders' performance in this area.

We would recommend that the new trust created to administer the fund be led by disabled people to ensure that the voices of those who receive services are heard and that they also have a direct role in the administration of the fund. In shaping our thinking on this proposal, we would refer the Scottish Government to the existing model in place via the Independent Living in Scotland project and Committee.

Alongside this recommendation, however, ENABLE Scotland strongly recommends that the Scottish Government tackles the wider issue of Local Authorities current inability to meet the needs of service users to allow them to live independently to the same degree that current ILF users are able to, through strengthened guidance and monitoring of the roll out of Self Directed Support and, in time, monitoring of how locality planning partnerships are delivering services and support which meet the needs of disabled people.

By tackling this wider issue the need for a national system (and associated costs) would be removed and the needs of all service users could be adequately met by their local authorities leading to a more cost effective, fairer and less bureaucratic process of service delivery.

Again, we seek to remind the Scottish Government of the ***Shared Vision for Independent Living*** statement signed by COSLA, NHS Scotland, the Scottish Government and the independent Living in Scotland Chair in March 2013 (<http://www.ilis.co.uk/uploads/Vision1.pdf>), and consider that an added advantage of a national Independent Living Trust would be that it could seek to promote adoption and adherence with the principles contained in this document throughout Scotland, and certainly by ensuring that funding applications demonstrate achievement of the Shared Vision for Independent Living as a pre requisite.

Question 7

To assist with our partial Equality Impact Assessment in relation to the future development of a sustainable Fund to support disabled people in Scotland to live independently, please describe any equality issues (in relation to age, disability, sex, sexual orientation, gender re-assignment, race, religion or belief, pregnancy and maternity and marriage and civil partnership) that you feel may arise and suggest ways in which these could be addressed.

We would ask that the Scottish Government recognise that people with a disability do not form one homogenous group and that individual groups within disability may be affected by any decisions taken about the Independent Living Fund to a greater or lesser extent.

The impact on particular groups may be affected by type of disability, age, gender, ethnicity etc.

We would ask that the Scottish Government conduct research into recipients of the fund which produces data which informs us who in Scotland is currently in receipt of the fund and then assess the impact of any decisions against these groups.

Carrying out the above will ensure that there is no direct or indirect discrimination following on from any decision made.

It will also be important to monitor this on going and may need further immediate reassessment depending on the decisions taken on the future of the fund.