

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:

It is recommended that the integration model specifies a requirement for the inclusion of at least one person who is a chief housing officer from the local authority within the integration joint board and monitoring committees to reflect the need for integration of housing, health and social care matters.

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

No

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:

More detailed definitions are required to provide understanding of what is actually to be included / excluded as local authority delegated functions and to ensure consistency of approach across Scotland.

Not all sections of legislation included as 'musts' for delegation would be relevant. For example:

- The housing sector in Fife would strongly oppose the mandatory inclusion of the functions under S92 (1) of the Housing (Scotland) Act 2001 which relates to the promotion of the formation or development of registered social landlords, as this is a clear strategic housing responsibility aligned to the delivery of a local housing strategy under section 89 of that Act. Other functions within Section 92 in relation to the funding of assistance to registered social landlords in relation to adaptations are irrelevant as funding is provided directly from the Scottish Government.
- The delegation of Section 71, Housing (Scotland) Act 2006 would include measures beyond providing assistance for aids and adaptations, including for example housing and land acquisitions / sales.

Equally, there needs to be clarity provided in the definition of functions to be delegated under Section 12 of the Social Work (Scotland) Act 1968, particularly the distinction between short-term housing support functions (the housing landlord role) and the provision of longer-term care packages (health and social care role). The housing sector in Fife considers that this should be linked to the full definition of housing support as set out by the Housing (Scotland) Act 2001 (Housing Support Services) Regulations 2002 (i.e. '21 tasks').

Section 24 of the Local Government and Planning (Scotland) Act 1982 (gardening assistance) and Section 24 of the Social Work (Scotland) Act 1968 and Section 5 of the Housing (Scotland) Act 1987 (laundry services) have been specifically identified over and above other services, without clear logic. These services are directly linked either to housing landlord and estates management functions. The Fife Housing Partnership's preference would be that they are included as part of a local agreement rather than through mandatory legislation.

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

The housing sector in Fife is concerned that the value of low-level early intervention / prevention activities traditionally delivered through housing landlord functions may be diminished unless further work is undertaken to define the elements of housing support, health and social care. Unless this clarity is provided, there is a likelihood that resources will transfer to high-cost, reactive services, impacting on budget outcomes and the care of individuals. For example, research undertaken by the University of Kent has highlighted the benefits to the health and social care agenda of the conversion of *Very Sheltered* housing into *Extra Care* housing, estimating that 80% of those in *Extra Care* housing would require care home provision if this type of alternative was not in place. It is estimated that the reduced need for care home provision was worth £19,000 per individual in *Extra Care* housing and that for every £1 invested, a social return of between £1.50 and £2.50 is achieved. The drafting of the regulations should allow this positive housing sector contribution to continue.

It is also not clear why Section 8 of the Housing (Scotland) Act (common housing registers) has been included as a potential delegated provision. We would ask that the Scottish Government detail the reasons for potentially including common housing registers within the regulations. In the Fife housing sector contribution model to Health and Social Care, it has been accepted that housing allocations policy and practice will be 'closely aligned' to the Integrated Partnership.

ANNEX 3(D)

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:

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 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.

4. Are there any further comments you would like to offer on these draft regulations?

The comprehensive approach applied to the definition of health services that must be included within integration is welcomed. The regulations would benefit from this approach being extended across all areas of integration, particularly to provide a specification of requirements for all housing services to vulnerable adults.

There are circumstances where the housing authority and registered social landlords are working in partnership with Social Work Services to ensure supported accommodation is available to clients through leasing or occupation agreements. Housing landlords set rent and service charges to cover capital and revenue costs associated with this provision. This cannot be fettered unduly by provision currently set out within the draft regulations.

**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:

The outcomes, specifically No. 3, 4, 5, 7, 8 & 9, would benefit from a specific reference to the integration of 'housing, health and social care' functions, particularly as some of these relate to current local authority housing activities that will be integrated after April 2015. We consider that outcome 2, 'Independent Living', is the nearest match to outcomes within the Scottish Social Housing Charter, and as such should be promoted as the housing indicator for health and social care.

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?

The outcomes, specifically No. 3, 4, 5, 7, 8 & 9, would benefit from a specific reference to the integration of 'housing, health and social care' functions, particularly as some of these relate to current local authority housing activities that will be integrated after April 2015. We consider that outcome 2, 'Independent Living', is the nearest match to outcomes within the Scottish Social Housing Charter, and as such should be promoted as the housing indicator for health and social care.

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?

Although work in Fife has begun to engage with service users and their carers to discuss the arrangements for integrated services, from a housing perspective that there is considerable work ahead in translating the national outcomes for clients.

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

**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:

The regulations should also provide a definition and list of 'housing professionals', particularly those in frontline services that will make a contribution to housing, health and social care integration, for example using the Chartered Institute of Housing as the professional body and its list of corporate members.

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?

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?

There is significant concern that the 'housing' role has not been specifically highlighted and defined and/or has been over-generalised through the Act and regulations. For example, there is no direct reference to local housing strategies. The Fife Housing Partnership is actively developing the Health & Social Care Sub-Approach as part of the Fife Local Housing Strategy 2015-2020.

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