

**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:

There remains lack of clarity on lines of governance, highlighted in the session with Board and Local Authority Chief Executives and output of the work which was agreed to be taken forward from that event.

The regulations should more clearly state that the IJB will have planning and service delivery responsibilities. With the strategic plan setting out the intentions of the Partnership for the full range of adult health and social care services which it manages on behalf of the parent bodies and those services for which it has a planning responsibility, including acute care, with the Health Board. There are a number of Local Authorities still of the view that the Partnerships will be strategic planning not integrated delivery organisations.

Further work is required to ensure there is clarity on the relationship between the CO, the CSWO and other professional advisers. The IJB should include professional advisers for at least nursing, medical AHP and social work. There needs to be a clear process for this work.

In board areas with more than one Integration Authority, Regulations should make explicit the requirement for partnerships to consider the aggregated impact of their plans on the acute system. It has been suggested that the health board develops and owns a Hospital Plan through consultation with the partnerships.

3. Are there any additional matters that should be included within the regulations?

Yes

No

4. If yes, please suggest:

There should be a requirement to meet staff governance standards included in the Integration Agreement.

The regulations should require the Integration agreement to set out how the Joint Board will have access to the full range of professional advice including nursing, AHPs and public health

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

Integration schemes should be required to include sign off of a viable budget which enable the partnership to deliver its objectives and prescribed outcomes.

**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:

Criminal justice social work as an adult social care service should be a prescribed service for inclusion to ensure success of partnership arrangements across services.

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

Where community and inpatient services for adult patient groups are presently established on an integrated model (for mental health, addictions, EMI and Learning disability) the delivery of these should be delegated to Partnerships on the same basis.

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:

The full range of primary care services need to be included not just GP services, e.g. General Dental Services, General Ophthalmic Services and General Pharmaceutical Services should be on the MUST list.

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:

Dialysis services delivered in the home should not be included, as this is an integral part of renal services.

3. Are you clear what is meant by the services listed in Schedule 2 (as described in Annex A)?

<b>Yes</b>	<input type="checkbox"/>
<b>No</b>	<input checked="" 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.

Notwithstanding the separate submission made by Board Chief Executives in relation to acute services it is important to note the terminology used in the regulations does not reflect the organisation of services or budgets used within NHS Scotland. Specifically, “Unplanned inpatients” and “Outpatient Accident & Emergency Services” are not commonly recognised terms; and there should be clarity over whether we mean Public Health or Health Promotion under Schedule 2.

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

ANNEX 4(D)

**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:

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?

National outcomes, whilst uncontroversial and aspirational, are not sufficient in themselves to achieve the policy aims as written; these are too broad and unmeasurable. As such, integration Authorities will require a suite of performance indicators that will support attainment of national outcomes.

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?

As per comment above

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:

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?

ANNEX 6(D)

**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?

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