

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:

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

ANNEX 2(D)

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:

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

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
No

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.

We represent the Psychology Directorate in NHS Education for Scotland (NES). NES is the body which commissions the pre-registration training for psychologists in the NHS in Scotland.

The entry under 'Clinical Psychology', in the 'who provides the service' column, is somewhat out of date. There have been developments in the range of staff delivering within these services, and in the grades of staff employed.

The following professionals would all be likely to provide care within the Clinical Psychology Service:

Clinical Psychologists
Clinical Associates in Applied Psychology
Counselling Psychologists
Health Psychologists
Clinical Psychology Assistants

4. Are there any further comments you would like to offer on these 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:

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?

Broadly the National Health and Wellbeing Outcomes cover the right areas. There would be significant advantages, however, in a change to the wording of Outcome 1. Although the intention may be that the phrase 'health and wellbeing' cover all aspects of physical and mental health, we would anticipate that most people will read it in terms of physical health only. This is a long-standing cultural bias, and it is widely accepted that Mental Health has been overlooked and neglected in the past, and that there has been discrimination in the health system. Making the Mental Health aspect of care explicit will go some way to redressing this cultural imbalance.

Outcome 1 would then read: 'People are able to look after and improve their own physical and mental health and wellbeing, and live in good health for longer.'

From the perspective of the Mental Health Services there is a great deal to be gained from this explicit recognition.

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?

In general the outcomes are clearly worded and should be easily understood by service users, planners and clinicians.
As outlined in the response to question 3 above, however, it is highly likely that, as a result of a historical focus on physical health and lack of recognition of mental health as a significant problem, people will understand Outcome 1 as relating only to physical health rather than to both physical and mental health. Given the prevalence of mental health problems, and the personal, social and economic costs of a failure to focus resources on this area, it would be advisable to include the phrase 'mental health' in the wording.
Outcome 1 would then read: 'People are able to look after and improve their own physical and mental health and wellbeing, and live in good health for longer.'

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

Firstly, we appreciate the opportunity to comment on the Draft Regulations Relating to Public Bodies (Joint Working) (Scotland) Act 2014. We agree that it is essential, in such an ambitious undertaking, to harness the expertise of a wide range of stakeholders, and engage with any concerns that they may express, in the development of the Act and related guidance. This will help to ensure unreserved commitment to the implementation of the proposals in the longer term.
We fully support the adoption of an outcomes based approach, and the proposal to measure the national health and wellbeing outcomes systematically. The ability to collect and compare data nationally will enable us to demonstrate equity of service provision and comparability of care standards across Scotland. We would emphasise the necessity of using statistically valid and reliable outcome measures, with clear implementation guidance, to ensure consistency of definitions and collection methodology across the country.
This answer extends over two pages. In case additional text cannot be seen here , I have included full answers on separate sheet

**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?

**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?