Social Care (Self-directed Support) (Scotland) Bill

Action on Hearing Loss Scotland

1. Are you generally in favour of the Bill and its provisions?

Action on Hearing Loss Scotland supports the Bill’s overall aims of allowing service users to have more control over the support they receive and to maximise individual choice. We would like to see a care system that is responsive to the needs of people with hearing loss and allows them to play a more active part in the administration and arrangements for their own care should they wish to do so.

2. What are your views on the principles proposed?

We believe that the three principles of ‘involvement’, ‘informed choice’ and ‘collaboration’ are appropriate ones to use to underpin this legislation. We particularly welcome the second principle (around ‘informed choice’):

A person must be provided with any assistance that is reasonably required to enable the person (a) to express any views the person may have about the options for self-directed support, and (b) to make an informed choice when choosing an option for self-directed support.

This is of great importance to deaf and hard of hearing persons who may need access to communication support during the assessment (and review) process in order to make a truly informed choice. However, we have some concerns over the implementation of this principle on the ground, especially about how to achieve consistently good outcomes across different local authority areas. The Bill states that local authorities ‘must have regard’ to the three principles and we are already aware of differences in service provision for the deaf and hard of hearing; for example, with regard to the level of deaf awareness and British Sign Language (BSL) skills among social work staff.¹

3. What are your views on the four options for self-directed support proposed in the Bill?

We have no specific comments on the four options.

4. Do you have any comment on the proposal that the self-directed support options should be made available to children and their families, together with the proposal that the degree of control a child may have over the process should vary with age?

We have no specific comments on this issue.

5. Are you satisfied with the provisions relating to the provision of information and advice, together with those concerning the support that should be offered to those who may have difficulty in making an informed decision?

We are pleased that local authorities must provide information about the four options for self-directed support in a format suitable to the person’s communication needs. In order to enable people with hearing loss to make an informed choice about their support, some may require communication support such as a BSL interpreter or an electronic note taker. Additionally, all written information materials, letters etc. should be in plain English to make them more accessible for BSL users.

We are aware that the Financial Memorandum to the Bill includes some provision for workforce development and training in connection with the implementation of the Bill. Deaf awareness training for relevant local authority staff would lead to greater levels of knowledge about how to arrange for communication support and when this might be needed. In some cases, very simple changes like looking at a deaf person (not down at a sheet of paper) while speaking can make a big difference and facilitate an informed and empowered decision for a service user who has a hearing loss. Given an apparent lack of clarity on take-up of direct payments among people with sensory impairment, we would welcome further thinking around how the four options for self-directed support can be promoted and made truly accessible and easy to understand for people with hearing loss.

Additionally, there may be opportunities for local authorities to utilise local support networks and third sector organisations to achieve better results for the sensory impaired as well as efficiencies through more joined-up working and the promotion of links between local authorities and voluntary organisations.

6. Are you satisfied that the method for modernising direct payments in the Bill will result in the change that the Government seeks?

We have no specific comments on this issue.

7. Do you have any views on the provisions relating to adult carers?

We have no specific comments on this issue.

8. Do you agree with the approach taken by the Scottish Government not to place restrictions on who may be employed by an individual through the proposals in the Bill?

We have no specific comments on this issue.

9. Do you have any views on the assumptions and calculations contained in the Financial Memorandum?
We have no specific comments on the Financial Memorandum.

10. Are you satisfied in the assessments that have taken place in regard to these matters and in the conclusions reached by the Scottish Government?

We have no specific comments on this issue.

11. Do you have any comments on any other provisions contained in the Bill that you wish to raise with the Committee?

No.

Action on Hearing Loss Scotland
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