We comprise the following organisations:

Carers Scotland, Coalition of Carers in Scotland, Crossroads Caring Scotland, MECOPP, The Princess Royal Trust for Carers in Scotland (part of Carers Trust), Scottish Young Carers Services Alliance and Shared Care Scotland.

We believe we can deliver more for carers by working together to share our knowledge and experience, and by focusing our collective efforts on achieving improvements in areas of policy and practice that are of greatest concern to carers. It is our shared vision that all Scotland’s unpaid carers will feel valued, included and supported as equal partners in the provision of care.

**Joint Statement**

We welcome the Self Directed Support Bill. The Bill is a positive step in bringing together and extending legislation in relation to self-directed support and in ensuring there is greater clarity and easier access to direct payments and other delivery mechanisms.

While we support the Bill we feel that it needs to be significantly strengthened in some areas, particularly in relation to:

- recognising carers as equal partners in care
- ensuring carers have equal access to SDS across Scotland by making it a Duty rather than a Power for local authorities to provide support to carers following an assessment. In addition, clear eligibility criteria need to be developed to support this process in order to avoid the potential issue that many carers who are assessed as requiring a service may not be able to access this as they do not achieve a high enough prioritisation when judged against other categories of service user.
- extending the ability for people to employ a relative through a direct payment. Local authorities and future joint planning and commissioning structures should have a duty to consider and respond positively to such requests. Where such requests cannot be granted they should offer clear reasons why the proposal would not be considered to safeguard the care of the service user
- reflecting the status of carers as equal partners in care and amending Section 16 in line with this principle by removing the ability for local authorities to charge carers for a service. Carers must be viewed as contributors to care provision, rather than as service users. They should not be expected to contribute financially to the cost of services provided to the person they care for, or to the cost of services which enable them to continue in their caring role.
We also have concerns about the implementation of the Bill and the need for clear guidance and direction to local authorities in relation to adhering to the principles of SDS, ensuring there are robust and fair processes and timescales in relation to implementation and that outcomes for service users and carers are clearly recorded, monitored and evaluated.

We would expect the Statutory Guidance accompanying the Bill to give direction to local authorities with respect to their responsibilities in relation to:

- being transparent and clear about how resources and budgets are prioritised and allocated to individuals, and being clear about what support is available, if necessary, to help people appeal a decision.

- adopting more proactive and flexible approach to carrying out assessments to achieve a greater uptake of assessments and consequently, a better understanding of the range and pattern of needs that exists locally.

- their role in ensuring there is sufficient choice and capacity within local services and supports to deliver the intended benefits of SDS. Smaller parent or community-led projects will be particularly vulnerable at this time without the financial cushion to see them safely through a transition to spot purchasing.

We look forward to working with government in the future in relation to the progress of the Bill and the development of regulations and guidance.

Joint Submission – National Carers Organisations
25 April 2012