1. Do you support the Bill?
We support the commitment to carers that the Bill represents and also with the legislative direction set out in the Bill. This is broadly similar to the strategic direction we have developed locally, in partnership with our stakeholders, including carers. We concur that it is vital to provide additional support to carers and in particular, more needs to be done to identify, assess and provide early support to carers. However, our key concern is that the additional duties for local authorities contained in the Bill, may not be fully resourced and that therefore they will place additional financial pressures on local authorities. For example, we are concerned that the ‘average’ unit costs identified for completing a ‘carers support plan’ falls short of the costs identified by Perth and Kinross Council. We anticipate an increase in the number of people requesting carer assessments (carer support plans) following the Bill and in particular, the duty to assess carers, and we are concerned that we will have a resource shortfall as we attempt to meet this demand. We are concerned that this may result in reputational damage for the Council.

2. What do you feel would be the benefits of the provisions set out in the Bill?
As noted above, the Bill demonstrates a commitment to carers from the Scottish Government and we agree that more needs to be done to support carers, particularly as our demographic changes are resulting in more frail and older people, whose main source of care will be from unpaid carers. This is a particular concern in Perth and Kinross which has a higher than average population of older people. We agree with the tenor of the Bill, in relation to the need to identify more carers, to provide more information and awareness to carers, to provide more assessments and support plans, to provide more respite options and to improve carers’ involvement in service design.

We support the removal of the ‘substantial and regular’ definition of a caring role and this is not a definition that is applied in Perth and Kinross.

We support the requirement to complete local carer strategies, although we think that there should be flexibility as to what these plans contain and we wonder if this detail might be more appropriate as guidance. At present, while we have a distinct carer strategy in Perth and Kinross, we also have plans for carers identified in other strategies, for example mental health and learning disability. We will also have plans for carers noted in our Strategic Commissioning Plan in relation to health and social care integration. We would like the flexibility to continue to develop plans, as we continue to engage with our local communities as equal partners.

We support the change to ‘Carer Support Plan’, as opposed to ‘carer assessment’. In Perth and Kinross we made this change of title many years ago, as we found carers felt a ‘carer assessment’ was to assess their ability to care correctly. We understand that this title change may give the impression
that support and service provision will be forthcoming, although this has not been our experience, in Perth and Kinross.

3. **How do you feel the Bill could be amended or strengthened?**

   We think that there is a lot of detail in the Bill that may be more appropriate as guidance rather than legislation. This is in relation to the detail about what is to be in the local carer strategy and in the carer support plan. We wonder if this is overly prescriptive and may raise expectations for support that will fuel demand that we will not be able to meet. We would prefer broader legislative scope but with attendant guidance, to give us the ability to develop local approaches that link to a range of other strategies and plans.

   We are also concerned that it is a ‘duty’ to provide a carer support plan for all carers, regardless of whether they are receiving a service or whether they are eligible. We think there should be the ability to have some local discretion in this regard. We completely support the notion that there are still too many carers that have not received any form of assessment or support, but we would want to be able to have local autonomy to target our resources to those carers that have the most need. We are principally thinking of occurrences where someone defines themselves as a ‘carer’ under the broader definition contained in the Bill, yet is to all extent and purposes far from meeting the eligibility criteria. We understand that a positive aspect of the carer support plan could be the aspect of signposting people to local community support or universal services, and also for information and advice. However, we wonder if there could be more scope for local autonomy to be able to assess first, without having to complete a carer support plan. For example, the ability to assess whether there is a requirement for a carer support plan.

4. **Is there anything that you would add to the Bill?**

   We wonder if the Bill should also take into account of the role of health professionals in providing support to carers. We wonder whether the Bill should specifically mention the role of health in meeting the needs of carers, in light of health and social care integration.

5. **Is there anything that you would remove from the Bill?**

   The Bill includes a prescribed form and content for carer support plans and defines personal outcomes; however, it also establishes a Ministerial power to re-define these personal outcomes in regulations. We are concerned that this seems overly prescriptive, as we would wish to align our carers support plans with our SDS processes, including our current range of outcomes.

   We are concerned with the noted Ministerial power to establish national criteria via subsequent legislation. We believe local authorities should have the power to establish their own eligibility criteria, or at least the ability to decide how we allocate resources within a national eligibility framework.

_Perth and Kinross Council_