The Carers (Scotland) Bill

Richard (Individual)

1 Section 8 Content of adult carer support plan

(1) An adult carer support plan must contain—

(a) information about the adult carer’s personal circumstances at the time of preparation of the plan, including

(i) the nature and extent of the care provided or to be provided day-to-day

(ii) the impact of caring on the adult carer’s wellbeing and day-to-day life

Add to (i) day-to-day

Only with this addition will it help to focus on specifics rather than generalisation, and accurately identify 8 (ii), and be congruent with it, as (ii) uses similar wording “day-to-day life”, and thus helps to identify 8 (c) (d) and (f)

8 (ii) “day-to-day life” This is the correct process focus. In our society we live in structures, by the day, and generally over 7 of these single days, by the week.

2 Section 8 (e) information about the support available to adult carers and cared-for persons in the responsible local authority’s area,

This should not be in every individual adult carer support plan – bureaucratic++.as it is not person centred information.

This would be better included in section 31 information and advice service for carers.

3 Section 8 (f) if the adult carer’s identified needs meet the local eligibility criteria, information about the support which the responsible local authority provides or intends to provide to the adult carer to meet those needs, including the nature and extent of the support to be provided to address the identified needs that will help meet the carers identified outcomes.

This section should be congruent with the beginning of the process identified earlier in 8 (1) (a) (i) and (ii) and thus include “nature and extent”. So these words should be added to the clause.

It is one thing meeting the criteria to receive a service, however the proof is in the pudding and the “nature and extent” of the support response should be itemised and quantified otherwise the ASSP will read more as only a
generalised statement of intent rather than as individualised and specific person centred content, and that will then only hide rather than reveal the detail of the “nature and extent” of the support being offered.

Suggest the words “the adult carer to” should be deleted otherwise, for example, replacement care would have to be omitted as a support option and 8 (h) would become superfluous as any break from caring for the carer will almost inevitably require some replacement care for the cared for person, and the funding to provide this replacement care.

Thus I suggest add to 8 (f) “including the nature and extent of the support to be provided to address the identified needs that will help meet the carers identified outcomes.”

4 Section 8 (g) similarly delete “to the adult carer”

5 Similar changes as above for Young Carers in Sections 11-13

6 Section 19 A national criteria, or at worst clear guidance on the content and structure of the criteria, would be more helpful in avoiding a post code lottery of service provision.

As the Bill currently reads it will create inequalities and a post code lottery of services that support carers across Scotland rather than reduce inequalities.

7 Section 23 Provision of support to carers: breaks from caring

23 (2) and (3) would be better to read if their numbering were reversed as 23 (3) relates to 23 (1)

8 In 23 (3) “varying periods of time” might read better substituted as “daily, weekly, or other frequency of support, and for varying periods of time”

This would again encourage a focus on the debilitating and relentless daily impact of caring, and focus on how our society is generally constructed to allow citizen participation, which is generally on a daily/ weekly basis.

9 Section 28 (2) (e) A strategy should always have aims and objectives, and include the funding used to provide existing support, and the future funding to deliver “the authorities plans for supporting carers in its area”

These seem to be cornerstone omissions, i) aims and objectives and ii) funding to deliver on the strategy.

10 Section 30 A publically published annual appraisal of progress towards implementation of the local carer strategy should be included. An annual appraisal of progress would usually be the minimum performance monitoring timescale for any such strategy. It would not be onerous and would aid delivery on the strategy, and carer involvement.
11 Suggest include that the maximum length of the strategy should be 5 years.

12 Section 31 Add (f) short break services (g) how to access an ACSP or an YCS (h) the local carer strategy (i) the detail of any charges for services (j) support to carers wishing to return to employment (k) list of service providers offering support directly or indirectly to carers and links to their latest inspection reports

13 Section 32 The emphasis should be on local services, not at macro level across Scotland. If Scotland is the focus in the Bill carers it could be argued could more appropriately access services across the border in England, or even Spain. Local focus is the key here, unless there are specific specialist national or UK services that are relevant to a particular carer’s identified needs.

14 Section 7e “the factors to be taken into account in identifying adult carer’s personal outcomes and needs for support”

This is fundamental to the success or failure of the impact of this Bill. As such these factors should be listed in the Bill and not wait to be included as regulations at a later stage.

Identification at this stage will also help to focus more accurately on calculating the financial impact and budgetary response to implement this Bill.

This would give a better national overarching framework of “factors” i.e. time with family and friends, adult education and training, paid employment, pursue leisure interests, regular breaks from caring, volunteering, any other factor that would support a carer in their caring role etc etc

15 There seems to be an omission in that paid employment while mentioned in the Explanatory Notes to the Bill does not have specific support factored in and costed, or a formula being deployed to arrive at a support cost

We know that some carers want to return to employment or increase their working hours. “Scotland’s Carers” Scot Gov March 2015 has 6% carers unable to take up work, 7% working fewer hours, 4% left their job and 2% took early retirement.

Digging behind the “average” data one sees tragically that female carers are unable to take up work at an early age 16-34 (4%-10% of carers) while for men at this age there is virtually zero impact.

And the impact is greatest on those on lowest incomes (below £13234)

The SG is rightly committing to extending free childcare from 600 hours per annum to 1140 hours. If we are to be consistent in tackling inequality and gender inequality, then this carer inequality should be formally addressed. If this is not considered arguably more working class female carers would be being treated as a pariah group.
Caring and subsequent unemployment, and underemployment, affects female carers disproportionately to male carers in some KEY aspects, as above. But both genders are adversely affected by caring, and the structural consequences further down the line can be reduced pension provision for carers in retirement due to employment opportunities being unrealisable.

16 Section 6. I am not clear how the Bill is supporting or negating the ability for carers to be empowered to undertake a “self assessment” of their personal outcomes and identified needs.

17 In order for carers to be supported there needs to be a range of different high quality services they can pick from locally, and Local Authorities need to have a duty, or similar responsibility, to commission such a range of services. I am not clear how the Bill intends to achieve this.

This would be reflected locally in the range of services available by different client groups, older people, older people with dementia, adult mental health, adults with a physical disability, adults with a learning disability, etc.

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