1. I note your request for evidence of the engagement of Integrated Authorities with their local communities and would refer you to Petition No 1628, for which evidence was heard on 2nd February 2017, which sets out the experience of two community bodies in Argyll & Bute and which sought changes to the Guidance on consultation and engagement as a result.

2. The Guidance on Informing, Engaging and Consulting People in Developing Health and Community Care Services is issued through CEL 4(2010). The guidance therefore relates to the period before the Integration of Health and Social Care, and as a result the existence of Integrated Joint Boards, and refers only to NHS Boards. It thus allows Integrated Joint Boards and Health and Social Care Corporate Bodies to dispute the legitimacy of the Guidance to these bodies!

3. Clause 8 in the Guidance refers to bodies that no longer exist in local areas!

4. Clause 14 in the Guidance states that the Scottish Health Council does not comment on Clinical or Financial issues. Therefore if a Board treats changes to service delivery as a clinical or financial matter it can exclude the SHC from comment. So by including in a financial plan the eviction of 12 vulnerable elderly people from their home by a Board there is no need to involve the SHC despite the fact that under any circumstances I would certainly consider this a major change in service delivery. Since all major changes have to be approved by the Scottish Government it is essential that what constitutes a major change is understood by the public as well as health care professionals (see 5. Below).

5. If a Board prepares a Plan to save money with 68 individual actions in it saving a total of £8.5m it seems that since individually if the Board deems the changes minor the
sum of the parts is also minor. The SHC in this case has not yet decided after 8 months whether the change/changes are major or minor. This suggests to me that the term major change in service delivery needs some clarity or perhaps even definition!

6. These are two very specific points to indicate the difficulty that the SHC has in co-operating and monitoring the work of Boards and are examples of how the guidance needs much more clarity in respect of this relationship and to allow the SHC to perform its function adequately and promptly.

7. This would be particularly helpful in a situation where the Board does not consider a change major but the community stakeholders do consider the change major! Equally this needs to be identified prior to a decision being approved otherwise the necessary consultation would not take place and any conflict needs to be resolved prior to Board decisions.

8. The guidance lacks detail on how Boards should communicate and engage with communities and therefore Boards can develop their own individual processes. It would be helpful if the guidance compelled Boards to publish their communication and engagement process detailing the community bodies involved. This would allow community groups excluded to apply for inclusion.

9. Finally I would make the point that Boards who behave in a proper manner in a spirit of openness and transparency will have little requirement for guidance. However Boards like Argyll & Bute IJB who fail in this regard will require guidance which is very clear and definitive to ensure compliance.