

CONSULTATION QUESTIONS

This consultation questionnaire sets out the consultation questions from within the relevant sections of the revised Adult Support & Protection Code of Practice.

The revised Code of Practice is a larger and more comprehensive document than the original Code and we welcome your views on any of the changes made. In particular, we would appreciate your views on the following matters.

Please insert your response to the questions in the text boxes provided.

Question 1: Chapter 3

This chapter of the Code sets out the principles of the Adult Support and Protection legislation and the definition of an adult at risk.

Does this chapter help in your understanding of the legislation and whom it applies to?

If not, what changes would you suggest?

Section 6 (p.24) in relation to the wishes of the adult lacks detail on sources of communication support, but would suggest this is addressed via an overarching statement rather than necessarily changing individual sections. The wording as it stands at the moment (*"with information to help that participation (in a way that is most likely to be understood by the adult). Where the adult needs help to communicate (for example, translation services or signing) then these needs should be considered"*) is weak and chooses surface level examples. An appendix based on the Scottish Government funded Royal College of Speech and Language Therapists project identifying good communication supports and strategies is suggested. The link between communication and capacity should also be highlighted. Professionals are not in a position to judge an individual's capacity unless they have maximised the communication supports

Section (p.27) The new section about young people and transition is particularly appreciated but it maybe helpful to reference GIRFEC so that policy documents are joined up and have cohesion

Section 24 (p.29) is overly lengthy and this makes it hard to digest the key points within it.

Question 2: Chapter 5

This chapter of the Code considers the principle of ensuring full regard is given to the wishes of the adult, and ensuring that the adult participates in decisions as fully as possible.

Does this chapter adequately covers the issues arising from ensuring as far as possible full participation by adults in decision making?

If not, what changes would you suggest?

Section 3 (p37) Should state Royal College of Speech and Language Therapists (RCSLT) rather than Royal Society. There is no link to the Adult Support and Protection toolkit funded by the Scottish Government and hosted within the RCSLT website. There is an erroneous link to Communication Forum Scotland, think they mean the http://www.rcslt.org/speech_and_language_therapy/Adult_Support_and_Protection_Communication_Toolkit

Section 4 should also refer to “Easy-Read” formats and the accessible version of the ASP Act created by the Talking Mats Ltd..Lois Cameron of Talking Mats Ltd. Can place resources online and provide an appropriate link. There should also be more information about forms of communication difficulty/support more common than those mentioned e.g. stroke-related difficulties, autism, learning disability, dementia.

Suggest a further section containing a frank statement about the need for allowing adequate time to prepare for and interview an individual who has, or may have, Communication Support Needs.

Suggest a further section about the requirement for staff engaged in ASP processes to undergo suitable training in Communication Support.

Suggest a further section advising that ASP teams should have a bank of resources suitable for work with people with a range of Communication Support Needs.

Section 5-9 does not mention the skills of advocates in relation to supporting people with CSN and how those are regulated and monitored for quality .If, as widely accepted to be appropriate, advocacy is to have a key role, then this is crucial.

Section 12 (p38) should also include mention of the need to provide adapted, accessible resources.

Page 39/40 Sections “Carers” should also contain reference to the fact that the carer themselves may have Communication Support Needs and may need supports to comprehend and participate fully in ASP processes.

Section 25 (p.41) should consider the need for audits to include explicit description of communication supports required and provided. Also, evidence in relation to staff training in communication support.

Question 3: Chapter 6

This chapter includes new guidance on large scale inquiries. Does this provide sufficient clarity for this type of inquiry or are there additional matters you would wish considered?

Section 6 (p.42) suggest sentence changed to “Any inquiry, investigation or intervention must be person-centred and based on an individual’s personal circumstances, especially in relation to any communication difficulties which might be a barrier to their full participation in the process”.

Section 22 (p.45) suggest the sentences is extended with the phrase “in a manner of format which suits them best”.

Question 4: Chapter 11

This chapter is a new addition to the Code and considers a multi-agency approach. Does this provide sufficient clarity and support for your organisation in handling multi-agency assessments and practice?

Are there other matters that you consider should be included in this chapter?

Section 7 (p.64) The second bullet point should be extended with the phrase “this would normally include specific training on communication support”. Suggest a further bullet point highlighting the need for an accessible version of minutes to be produced. Further suggest a bullet point on the need for an evaluation/debrief process to capture the views of the participants on the running of the process and any areas for change.

Question 5: Users and Carers

The Code seeks to develop and articulate good practice as regards service user and carer involvement, particularly in chapters 5 and 16. Does it succeed in this? If not please suggest ways in which this area could be improved on.

We welcome the examples throughout he code of practice in relation to communication support. The code would be further enlivened and strengthened by relating the views and experiences of users and carers by direct quotes.

The Talking Mats Ltd Adult Support and Protection projects should be referenced as good examples in relation to seeking the views of users and carers, and also the recent work with Survivor Scotland and KASP. This work followed on from work conducted by NHS Fife and the framework allows people with learning disability to reflect holistically on their life and raise issues of concern. The model developed by Talking Mats Ltd and discussed in their training which relates capacity to decision making and language and cognitive demands would be a helpful to refer to (Murphy, Cameron and Boa 2013 Talking Mats : A resource to enhance communication).

Emerging evidence suggests that ASP measures are being used most commonly in relation to Older Adults and Adults with Learning Disability, which therefore makes the agenda in relation to Communication Support even more pertinent.

We would reiterate that all populations contain people with communication support needs, and features of carer populations makes these likely to be even more common in carers of people involve din ASP processes than in the general population. Therefore ASP planning and processes must take account for the potential for carers and other parties to require communication adaptation and support.

Question 6:

Do you consider this revised Code of Practice will enable you to carry out your professional responsibilities effectively? Please feel free to comment on any areas of the Code which you consider could be improved in any way.

Given the high incidence of people requiring support from ASP there still needs to be a greater focus on developing skills in communication support to ensure the spirit of the act can be implemented in practice.

Any further comments

The revised code of practice highlights many good examples in relation to communication support. However, as adult participation is a central principle of the legislation communication support strategies need a prominent place in the guidance from the outset.

The Royal College of Speech & Language Therapists would be happy to engage in further discussions around these issues.