

CONSULTATION QUESTIONS

The Carer's Assessment: Carer's Support Plan

Question 1: Should we change the name of the carer's assessment to the Carer's Support Plan?

Yes

No

We support the name change from Carers Assessments to Carers Support Plan. We believe this more accurately reflects their purpose which should be to plan what support can be provided to help the carer manage their caring role and have a life outside caring.

We also support the option to devolve the process for undertaking Carers Support Plans to the third sector (see example below) but would restrict this specifically to carer organisations as they will better understand the caring role and may already have the relationship with the carer. However, our position is that there needs to be an understanding that the duty still sits with the local authority and there must be a clear process for picking up on needs identified through the assessment.

Carers Link East Dunbartonshire have been carrying out Carer Assessments for local carers since 2005 as part of our role in providing advocacy for carers. Whilst we may make recommendations or suggestions and outline the impact should support not be provided, final decision in resource allocation rests with the local authority.

In 2013, the form was redesigned to have an outcomes approach. Importantly it is also used as an i-pad app to make it more efficient for staff and less foreboding for carers than a lengthy form.

Views of East Dunbartonshire Carers:

"Care plan – should assess full impact of carer's role on wider family too. Dad is principle carer but I help a LOT!"

"Other than my GP, Carers Link is the only constant relationship during my caring journey of my son over the last 10 years"

"Would prefer a third sector agency to do assessments."

"Carers Link should do assessments; there is a conflict of interest with social workers as they hold the purse strings."

Question 2: Should we remove the substantial and regular test so that all carers will be eligible for the Carer's Support Plan?

Yes

No

We support the removal of the regular and substantial test and the proposal to extend the Carer Support Plan to all carers. We believe that this will enable carers to access information and support at an earlier stage, preventing crisis and greater cost at a later stage. However, it is vital to ensure that there are sufficient resources for both statutory and voluntary agencies to complete the Support plans and to respond with the range of services that may be required.

Question 3: Should we remove that part of the existing carer assessment process whereby the cared-for person is a person for whom the local authority must or may provide community care services/children's services?

Yes

No

We support separating the carer's assessment from the assessment of the cared for person, so that a carer can access an assessment even if the person they care for is not in receipt of any services.

Question 4: Should we introduce two routes through to the Carer's Support Plan – at the carer's request and by the local authority making an offer?

Yes

No

We agree that the Carer Support Plan – and review – should be made available on request by the carer AND offered by both statutory and health bodies. The review process should be clearly outlined in guidance. The carer should be offered the opportunity for a yearly review, as a minimum; however they should not be obliged to take this up. Otherwise carers should be able to trigger a review at any point to take account of changed circumstances.

Question 5: Should we remove from statute the wording about the carer's ability to provide care?

Yes

No

Comments:

Question 6: Should we introduce a duty for local authorities to inform the carer of the length of time it is likely to take to receive the Carer's Support Plan and if it exceeds this time, to be advised of the reasons?

Yes

No

We welcome an improved approach to legislate for local authorities to have a process for informing carers of the time it will take until they receive a Carer's Support Plan. Whilst we recognise that there are challenges in setting maximum waiting times, not least that it may become a standard waiting time, our experience is that most carers currently

requesting a Carer's Assessment (Support Plan) are doing so because they are already in crisis and require an Assessment of Need before resources can be allocated to support them, therefore a lengthy timescale will not be supportive. We believe that there should therefore be publication of the agreed timescale (e.g. preferably 28 days but certainly not exceeding 12 weeks) to ensure that carers do not go beyond crisis point before they receive support.

Question 7: How significant an issue is portability of assessment for service users and carers?

Portability of Support Plans for carers makes sense. We support the idea of a smooth transition of supports should a carer move local authorities although we recognise that not all services – specifically those provided by carer organisations – may be available throughout.

Question 8: Should the Scottish Government and COSLA with relevant interests work together to take forward improvements to the portability of assessment?

Yes

No

Information and Advice

Question 9: Should we introduce a duty for local authorities to establish and maintain a service for providing people with information and advice relating to the Carer's Support Plan and support for carers and young carers?

Yes

No

We support the proposal to place a duty on Local Authorities to establish and maintain an information service. However we have concerns that Local Authorities may try to establish their own services, rather than properly resourcing existing carer support services. Our position is that there needs to be a quality support framework for carer information services and carers must play a central role in deciding who provides the information service in their area, taking account of existing services.

Furthermore it is essential that carer information and advice services are based locally and also take account of the needs of more isolated carers, such as those living in remote and island communities and within BME communities. It is important that information is of a wider nature but that it is provided in a tailored and personal manner to the carer. It is vitally important that the expertise which already exists within established carer centres is fully utilised – providing carers information from a carer perspective not that of the person being cared-for or of a statutory agency. There must be support available in understanding all the available information as information is best provided within a trusted relationship.

Views of East Dunbartonshire Carers:

"Not enough information is given to carers. Only if you are given direction to Carers Link

do you receive help and information on the role of a carer, and carers' rights."

"Could the CIS funds be distributed through the NCO's? Would that help maintain good practice throughout the country?"

"Don't reinvent the wheel regarding information provision. If there is already an independent carers' organisation in place within a local authority then retain and build on their existing expertise."

"The needs of carers have been neglected by Government for far too long. This applies particularly to carers who are well up in years themselves. I would like to highlight also the duty of the Local Authority to provide information about ALL the support available to them."

Question 10: Should we repeal section 12 of the Community Care and Health (Scotland) Act 2002 about the submission of Carer information Strategies to Scottish Ministers, subject to reassurances, which are subject in turn to Spending Review decisions, about the continuation of funding to Health Boards for support to carers and young carers?

Yes

No

In relation to the proposal to repeal the requirement for Health Boards to produce a Carer Information Strategy (CIS). Our view is that if this duty is repealed there needs to be a continued focus from health in identifying, informing and supporting carers, including directing resources to carer support as a continuation of CIS funding (see below). The mechanisms for directing resources to carer support need to be nationally agreed and embedded within the new integrated partnerships. Whilst it may not be necessary to have a strategy document *per se*, we would like to see the key content theme of the CIS be covered within a Joint Local Authority/ Health Strategy for Carers.

Carers Link East Dunbartonshire receives £56,000 of CIS funding per year from the Community Health Partnership, and this is supplemented by carer donations and fundraising. This is used to provide our 'Caring with Confidence' programme of 90 training events or courses each year. Courses range from Backcare to Relaxation Skills, from Computing to Carer Rights. Since starting, carers have participated on 2963 occasions within 311 courses.

*"My advice is that if you can come to a course, get on to a course, **take advantage and do it**. You can **learn** a great deal, you can have fun as well but above all, you come away with good experience.....**a positive experience**. It's all about really trying to **enrich** your own life while coping and catering for someone else's needs. So whatever course is available, do it." Carer ID 960*

Support to Carers (other than information and advice)

Question 11: Should we introduce a duty to support carers and young carers, linked to an eligibility framework?

Yes

No

We wholeheartedly support the proposal to introduce a duty on local authorities to provide support to carers and young carers.

In relation to the development of an eligibility framework, our position is as follows:

- Eligibility criteria must be co-produced by carers and must be specific to the needs of carers, rather being adapted from existing eligibility criteria for other care groups.
- Eligibility criteria should be produced nationally to avoid further inconsistency in relation to the provision of services and support to carers
- The eligibility criteria must be linked to the needs of the cared- for person, but this should not be the only criteria determining a carer's eligibility. Additional factors must be considered, such as carer's health, employment status, additional responsibilities outside the caring role, life outside caring etc.
- Eligibility criteria must have a preventative aspect to it.
- In addition, our carers have asked that any agreed criteria must be open and publicised

We are however concerned that there is a growing gap between policies of early intervention/prevention and the reality of tightened eligibility criteria. The duty to support must have resources attached to it for it to be successfully implemented.

Views of East Dunbartonshire Carers:

"Duty should be in place:

- *Carers will thus be given value.*
- *Carers will no longer be the "invisible" caring, supporting element.*
- *Carers will have to be taken into account and their needs supported. They will no longer be forgotten. But services need to be reliable, efficient & personal. Each person is unique!"*

"Eligibility criteria has to take account of what constitutes 'support' to individual carers and their ability to cope e.g. two carers in the same situation – one needs short break, the other just needs to talk to someone."

"Policy is a token gesture if capacity and funding for carers and carers centres is not improved"

*"Caring is **hard work**, all "workers" have rights and we thus deserve them too. Powers "too weak"; "Duties" need delivering and can be monitored and made accountable. We need "consistent delivery" and this Bill might produce this."*

"As a Carer to our son who has a learning disability and now he is 37 years of age we have never been able to get a holiday on our own, even after requesting a Carers Assessment and more support is required for Carers to enable them to Care for longer."

"Carers play a vital role. They save the government lots of money and get paid a pittance for doing so. They have to put their own lives on hold and it can be detrimental to their

own health and need a break from time to time. They need to be recognised for what they do."

Question 12: Alternatively, should we retain the existing discretionary power to support carers and young carers?

Yes

No

We believe, however, that the discretionary power to support carers who do not meet eligibility criteria should be retained. We believe that this approach will result in greater consistency in the provision of support and services to carers and will help to protect carers' health and wellbeing. It should also act as a catalyst to encourage additional investment in carer support services, including short breaks, helping to address gaps in services and the current pressure on available provision. As above, we are concerned that there is a growing gap between policy of early intervention/prevention and the reality of tightened eligibility criteria, retaining the discretionary power may ensure some additional carers receive support required.

Question 13: Should we introduce a duty to provide short breaks?

Yes

No

We agree that there should be a duty to both provide *and promote* short breaks, according to an eligibility framework (see notes above).

Stages and Transitions

Question 14: Should we issue statutory guidance on the Carer's Support Plan which will include guidance for those undertaking the Carer's Support Plan on managing stages of caring? This would apply to adult carers only. (For young carers, practice guidance will be developed to support management of a Child's Plan through the stages of caring).

Yes

No

We believe that guidance should be issued on the Carer Support Plan that includes guidance on managing stages of caring.

Question 15: Should new carers' legislation provide for young carers to have a Carer's Support Plan if they seem likely to become an adult carer? Any agreed support recorded in the Carer's Support Plan would be put in place after the young carer becomes a (young) adult carer.

Yes

No

We also believe that young carers who are likely to become adult carers should have a Carer Support Plan, and that this should be carried out well in advance of the young person reaching the age of 18 so that the transition is as smooth as possible. Whilst transition Planning should be appropriate to the child, we believe that it should start about the age of 15-16.

In addition:

Whilst we understand that issues affecting young carers and young adult carers are to be addressed within the Children and Young Peoples' Act, we believe there should be more detailed inclusion within the Carers' Bill – perhaps cross referencing between the 2 pieces of legislation. In particular, all young carers need to be offered a Young Carer's Support Plan. The Children and Young Peoples' Act only provides for this if the child's wellbeing is affected by their caring role.

Views of East Dunbartonshire Carers:

"Young carers must be a priority – children need this childhood and not be deprived of schooling etc. which will affect their later life and potential."

"I feel that the young carers need more support than is available at present."

"Young Carers need all the help they can get."

"Too many young and old people are left isolated and caring for relatives – friends. It is a problem society has and on the increase continually."

"Back to the drawing board in terms of Young Carers Legislation. It should be much more specific for young carers."

Carer Involvement

Question 16: Should there be carer involvement in the planning, shaping and delivery of services for the people they care for and support for carers in areas outwith the scope of integration?

Yes

No

We wholeheartedly support the proposal to require integrated and non-integrated bodies to include carers in the planning, shaping and delivery of services. We believe it is important that carers and people who use services are involved in determining the types of support and services that should be available in their community. However we think it is imperative that such involvement of carers is subject to the recently published **"Equal and Expert: 3 best practice standards for carer engagement"**.

Views of East Dunbartonshire Carers:

"It is a logical approach to ensuring carers are given recognition as important stakeholders in their role in caring for others."

"Carers should have a louder voice."

Question 17: Should we make provision for the involvement of carers' organisations in the planning, shaping and delivery of services and support falling outwith the scope of integration?

Yes

No

Whilst carer involvement within planning, shaping and delivery of services is vital, we believe that carer centres should also play an essential role in this regard. Carer Centres can bring a wider representation of carers with a deeper understanding of how caring differs across the range of care conditions or range of life circumstances affecting the carer. Indeed carer centres should be resourced directly to assist in the representation of carers and/or to encourage active involvement of carers in service development.

Question 18: Should we establish a principle about carer and young carer involvement in care planning for service users (subject to consent) and support for themselves in areas not covered in existing legislation?

Yes

No

We support proposals to enhance legislation on the involvement of carers and young carers in care planning for the person they care for and in shaping the support they need to help them manage their caring role and have a life outside caring. We believe that the knowledge and experience of carers should be recognised and valued in care planning and that they (and the person they care for) are the experts in deciding what services and support is needed.

Question 19: What are your views on making provision for young carer involvement in the planning, shaping and delivery of services for cared-for people and support for young carers?

We believe that young carers should also have an opportunity to become involved in shaping services in their community. This can be done using methods which are age appropriate, in partnership with young carer support projects, such as young carer forums and the Scottish Young Carers Festival.

Planning and Delivery

Question 20: Should we introduce statutory provision to the effect that a local authority and each relevant Health Board must collaborate and involve relevant organisations and carers in the development of local carers strategies which must be kept under review and updated every three years?

Yes

No

We believe that there should be statutory provision for local authorities and health boards to involve and collaborate with carers and carers' organisations in the development of a local Carer's Strategy. These should be connected to the national carers' strategy. We would also ask that the key themes of identification, information and carer training covered within the Health Carer Information Strategies are incorporated into these local plans.

We believe that Young Carers' strategies should also be developed. This could be a distinct part of the Carers' Strategy or a separate document, but the needs of young carers should be considered alongside adult carers in a local area. Not all young carers will be accessing children's services and therefore may not be covered by a Children's Services Plan.

In particular, the delivery of these strategies should be publically monitored and that there should be accountability with the carers that the document is meant to support to prevent such strategies quickly becoming no more than a document gathering dust on a shelf.

Question 21: Should we introduce statutory provision to the effect that local authorities with Health Boards must take steps to ensure, in so far as is reasonably practicable, that a sufficient range of services is available for meeting the needs for support to carers and young carers in the area?

Yes

No

We believe that local authorities should ensure that there are sufficient services in their area to meet carers' needs. There should be a definitive list of universal, free services that are available to all carers and that form the core services provided by carers' centres and services. This would be the minimum standard for services to provide for carers. Nevertheless, the ability to develop local practice or innovative services should also still be encouraged.

Views of East Dunbartonshire Carers:

"Also more funding should be made available to help organisations such as Carers Link who do a great service for the community by just being there to listen, when things get too much."

*"Carers Link offers me a lot of support, for which I am very, very grateful. I support the Carers Bill as it is time for the Government to recognise the hard work that carers like me do – usually willingly and in my case free of charge. I feel that it is time for the Government to take responsibility to step up to the mark. We are **REAL** people not just statistics. "*

"Carers Link MUST survive! – How can the members help achieve this?"

"Less of a postcode lottery – all authorities should provide the same services etc. and the Bill might lead to a fairer delivery across the board."

Identification

Question 22: Should there be no legislative provision for GPs or local authorities to maintain a Carers Register in order to support the identification of carers?

Yes

No

We disagree that there should be no legislative provision for GPs or local authorities to maintain a Carers Register. Whilst this aspect was not unanimously supported by all our carers, the numbers that disagreed with the concept were in single figures. It would appear that their reason for not supporting this aspect was often more to do with a lack of trust in their GP practice than with the principle.

Question 23: Should the Scottish Government ensure that good practice is widely spread amongst Health Boards about the proactive use of Registers of Carers within GP practices?

Yes

No

We therefore also agree that the use of a GP Register should be pro-active and propose that the GP register should be linked to actions to support the carer, such as a Carers Support Plan and referral to a local carer support organisation. We feel strongly that a register should not be just a collection of statistics; it needs to be outcomes focused. In particular, there should be a named person within each practice grouping to lead on carer support.

Question 24: Should the Scottish Government ask Health Boards to monitor compliance with the core contractual elements of the GP contract?

Yes

No

We believe that the maintaining of the Register should also be monitored and held accountable

Carer and Cared-for Person(s) in Different Local Authority Areas

Question 25: What are the views of respondents on the lead local authority for undertaking the Carer's Support Plan and agreeing support to the carer where the carer lives in a different local authority area to the cared-for person(s)?

We believe that this is largely between local authorities and COSLA to agree, however we do agree with the publication of publically available guidance. Nevertheless, we do believe in a common-sense approach to the support of the carer in this regard as illustrated below.

Carers Link East Dunbartonshire provides support to any carer that lives within the local

authority – no matter where the person they care-for lives. Likewise we support any carer who lives elsewhere if the person they care for lives in East Dunbartonshire. As a small local authority bordered by 4 other authorities, this approach has made it easier for the carers to pick and choose the type of support they require. A carer living in for example Glasgow may prefer their own local carer support group but can still access advocacy from ourselves in liaising with East Dunbartonshire as the local authority of the person they care for.

Question 26: What are the views of respondents on which local authority should cover the costs of support to the carer in these circumstances?

Comments:

Question 27: Should the Scottish Government with COSLA produce guidance for local authorities?

Yes

No

Comments:

Additional Proposals

In addition to the proposals outlined by the government, we believe that legislation could be strengthened by the addition of the following proposals:

Hospital Discharge – We propose a Duty on health to inform and involve carers in hospital discharge procedures. Where the care provided by an unpaid carer is included within a hospital discharge plan, they should be able to specify how much care they are willing and able to provide.

Emergency and Anticipatory Care Planning – We propose that the Carers Support Plan should include a duty to incorporate anticipatory care planning.

Views of East Dunbartonshire Carers:

“As for the health agencies informing and involving Carers on Hospital admission. That would be heaven sent!) When my loved ones have to go into hospital it is a nightmare! They listen to nothing the carer says. My husband has had a stroke and yet they ask him for a list of his medication of the top of his head!!”

“My father was in three hospitals in two days. I was not given information about his moving from the first two hospitals.”

“Hospitals should be aware of informing carers or relatives of any patient in their care if moving or discharging them.”

Additional Views of East Dunbartonshire Carers on the overall Bill Proposals:

“No society can be judged fair or compassionate if it fails to recognise the efforts of those who care for others.”

"For some time now, carers have been low down in the pecking order..."

"Caring is hard work – all 'workers' have rights and we thus deserve them too"

"It will possibly identify the many carers out there who carry on regardless and not ask for help and when they do, get told 'there is more important cases'"

"I was told there would be an army of people 'out there' to help me cope with my caring role. After waiting 6 months, I realised I was on my own with NO SUPPORT...The Scottish Government MUST listen to the carers' concerns and act...A Carers Bill NEEDS to be put in place to support carers".

"Carers deserve much more support – the duty of a carer is both emotionally & physically exhausting. Please help!

The route to obtaining support should be simple & easy & quick...it is easy to understand how many people fall through the cracks"

"Carers do not have any rights and save the government a fortune financially as we are just cheap labour in our caring roles. We are totally undervalued!"

"If you look after a relative who is seriously ill long enough and don't have support you will need a carer yourself"

"...It is time for the government to take responsibility and step up to the mark. We are real people not just statistics."

"Carers save the government huge sums and are essential to the operation of this country. They are however neither superhuman nor immortal. There needs to be better provision to safeguard their well-being..."