

Response ID ANON-9711-K15J-D

Submitted to Discussion document to support further engagement on Safe and Effective Staffing in Health and Social Care
Submitted on 2018-02-19 11:53:30

A workload and workforce planning duty applicable to Health Boards and care service providers

1a Do you think it is important to have a coherent legislative framework across health and social care to underpin workforce planning and appropriate staffing in health and social care?

Yes

moderately important

1b How should organisations' progress in meeting requirements be monitored and facilitated, taking account of what currently works well?

How should organisations' progress in meeting requirements be monitored and facilitated, taking account of what currently works well?:

It is important that that any development does not lead to a further administrative burden. Perhaps the renewed focus around workforce planning across the entire multi- disciplinary team allows a structure for this. The focus should be on understanding both the opportunity and challenge of working, not only in MDTs but across the whole system.

1c Please provide any other comments you may have.

Please provide any other comments you may have.:

While we agree that it is important to have a coherent legislative framework across health and social care regarding staffing, we feel that this already exists. There is already a statutory requirement, articulated in Integration Schemes, that Integration Joint Boards should produce a workforce plan, and it is vital that this is develop in line with local needs and local requirements. Additional legislation requiring the use of specific tools etc set at a national level runs the risk of removing the scope for plans to be tailored locally.

Overarching principles applicable to health and social care service providers

2a What is your view of the proposal that there should be guiding principles for workforce planning to provide NHS Boards and care service providers with a foundation on which to base their staffing considerations?

Agree

2b Do you have a view on whether/how application of these principles should be monitored?

Do you have a view on whether/how application of these principles should be monitored? :

While we have no issue with the concept of a few overarching guiding principles being in place, we do not believe there needs to be additional bureaucracy created to monitor that these are being implemented at a local level. Existing legislation and the new Health and Social Care Standards already provide a clear basis for workforce planning.

2c Please rate the following examples of potential principles (note that the following do not represent draft wording for the principles to be included in legislation).

Please rate the following examples of potential principles (note that the following do not represent draft wording for the principles to be included in legislation). - i. Workforce planning must ensure an appropriate number and mix of staff to provide high quality services.:

Very important

Please rate the following examples of potential principles (note that the following do not represent draft wording for the principles to be included in legislation). - ii. Workforce planning must ensure an appropriate number and mix of staff to provide effective and efficient use of resources.:

Very important

Please rate the following examples of potential principles (note that the following do not represent draft wording for the principles to be included in legislation). - iii. Workforce planning must ensure an appropriate number and mix of staff to provide services that meet service user needs.:

Very important

Please rate the following examples of potential principles (note that the following do not represent draft wording for the principles to be included in legislation). - iv. Workforce planning must ensure an appropriate number and mix of staff to provide services that respect the dignity and rights of service users.:

Very important

2d Are there other principles you think should be included?

Are there other principles you think should be included?:

The ability to develop a workforce that can respond to the challenges of recruitment and retention particularly in rural areas.

The principles also need to reflect the health and social care environments and the need for redesign to ensure that services are sustainable and affordable.

Requirements applicable to Health Boards

3a What is your view on the proposed requirements for Health Boards?

Agree

3b Are there any other requirements you think should be included?

Are there any other requirements you think should be included?:

No

3c Please provide any other comments on the proposed requirements set out in section 3.

Please provide any other comments on the proposed requirements set out in section 3.:

Any legislative requirements placed up the Health Board will need to take cognizance of the significant overlap of governance responsibilities between IJBs and Health Boards (and local authorities).

Development of validated tools and methodologies for the social care sector

4 Do you agree with the proposed role for the Care Inspectorate in leading work, with the social care sector, to develop workforce planning tools for application in specified settings, where there is an identified need?

Disagree

If you answered Disagree/Strongly disagree, who else do you think should lead this work?:

A national working group should lead this work. The involvement of the Care Inspectorate in any such development may lead to a conflict of interest should they then carry out future inspections which are, in part, about the applications of tools it has itself developed.

4b Do you think that social work should be included within the scope of this legislation (while there is currently no proposal to include social work, this could be considered for inclusion at a later stage).

Disagree

4c Please provide any other comments on the inclusion of social work within the scope of the legislation.

Please provide any other comments on the inclusion of social work within the scope of the legislation.:

As referenced previously, we believe that existing legislation is sufficient.

Role of the sector in identification of the social care settings for which there may be a need for development and application of validated tools and methodologies and for inclusion within legislation.

5a In delivering the function described under 3, the Care Inspectorate could be required:

In delivering the function described under 3, the Care Inspectorate could be required: - i. To work with employers/service providers and commissioners from the sector to identify and agree specified settings where there is a need for the development of workforce planning tools and methodologies.:

Very important

In delivering the function described under 3, the Care Inspectorate could be required: - ii. To work with service providers and commissioners from the appropriate parts of the sector to develop and validate workforce planning tools and methodologies to demonstrate that they are practicable and beneficial for specific settings.:

Very important

In delivering the function described under 3, the Care Inspectorate could be required: - iii. To consult with the sector before a requirement to use validated workforce planning tools and methodologies is confirmed in regulations.:

Very important

5b Are there any other routes you think should be considered to ensure appropriate engagement with the sector?

Are there any other routes you think should be considered to ensure appropriate engagement with the sector?:

No, however a significant issue is that there are 32 local authority service providers and hundreds of Third Sector and Independent Sector providers. To engage appropriately with all of these stakeholders would take a significantly long period, notwithstanding the very different viewpoints each of those bodies would likely have – making development of a tool based on consensus and supported by all stakeholders extremely challenging.

5c Please identify any settings where you think the development of appropriate workload and workforce planning tool or methodology is most important; and any care settings where you think this is not relevant or required.

Please identify any settings where you think the development of appropriate workload and workforce planning tool or methodology is most important; and any care settings where you think this is not relevant or required.:

As referenced previously, we believe that existing legislation is sufficient and no further tools are required.

Support for the development of validated tools and methodologies for the social care sector.

6 What support do you think will be required / most useful to enable the development of validated tools and methodologies for the social care sector?

What support do you think will be required / most useful to enable the development of validated tools and methodologies for the social care sector? -

i. Dedicated central expertise for the identification of specified settings where the development of workload and workforce planning tools and methodologies would be practicable and beneficial.:

Very important

What support do you think will be required / most useful to enable the development of validated tools and methodologies for the social care sector? - Additional resource for the Care Inspectorate to enable the proposed functions.:

Very important

What support do you think will be required / most useful to enable the development of validated tools and methodologies for the social care sector? - Training for key personnel in the sector in the development of workforce planning approaches.:

Very important

What support do you think will be required / most useful to enable the development of validated tools and methodologies for the social care sector? - Dedicated resource for service providers who engage in the development and validation of approaches, tools and methodologies.:

Very important

What support do you think will be required / most useful to enable the development of validated tools and methodologies for the social care sector? - Training for key personnel in specified services once validated tools and methodologies are confirmed through regulations.:

Very important

What support do you think will be required / most useful to enable the development of validated tools and methodologies for the social care sector? - Other: Please specify below:

Very important

If other, please specify.:

Each of the above is clearly important and difficult to argue against.

Investment in additional capacity to upgrade Information Systems to ensure any tools are compatible with existing systems.

Sufficient investment in capacity for IJBs / HSCPs to deliver on any new legislative requirements. It is vital that the costs of implementing legislation are identified in development of the draft Bill, and that provision is made in future budget settlements to meet the additional costs this legislation will place on IJBs / HSCPs.

Risks and unintended consequences

7a What risks or unintended consequences might arise as a result of the proposed legislation and potential requirements?

What risks or unintended consequences might arise as a result of the proposed legislation and potential requirements? :

There is significant risk of an additional layer of administration and bureaucracy being added to existing systems.

There is also a risk that focussing on the use of specific tools results in a 'tick box' culture which detracts from focussing on outcomes.

There is further risk that a legislative requirement to use particular tools could stifle innovation in the development of new ways of working, and that such tools are not sufficiently dynamic to meet changing demands in the integrated health and social care landscape, nor sophisticated enough to respond to the significant diversity across HSCPs in terms of geography, scale, needs and demand etc.

Development of tools and / or an approach considering one professional group (or a limited number of groups) in isolation may be detrimental to the development of integrated services across health and social care.

There is also a risk that IJBs / HSCPs are unable to deliver on any new legislative requirements should they not be fully funded. Alternatively, resources may have to be diverted from other frontline services in order to deliver on these requirements.

7b What steps could be taken to deal with these consequences?

What steps could be taken to deal with these consequences? :

We would recommend that time, space and resources are given to delivering the recommendations in the National Workforce Plan for Health and Social Care, rather than extending the proposed legislation to social care at this time.

There must also be further consideration given to the current HSCP landscape, how integration is operating at a practical level, and the implications of this.

About you

What is your name?

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Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:

Chief Officers Group for Health and Social Care Scotland

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response only (without name)

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

Evaluation

Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Neither satisfied nor dissatisfied

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Slightly satisfied

Please enter comments here.: