

The Independent Review of Adult Social Care

An initial response to the Feeley Report and its recommendations from a housing support perspective

7th June 2021

Introduction

The Housing Support Enabling Unit works with housing support providers in the voluntary and independent sector across Scotland and is jointly hosted by CCPS (Coalition of Care and Support Providers in Scotland) and SFHA (Scottish Federation of Housing Associations). The purpose of this paper is to consider the [report](#) by the Independent Review of Adult Social Care through the lens of housing support and reflect on some of the discussions that have been taking place across the sector in response to the review. This paper will be updated to reflect further engagement with housing support providers as plans for the National Care Service are developed.

Background

Ten years ago we saw the Christie Commission¹ looking at the future delivery of public services in Scotland. Christie spoke of reforming the delivery of services as being a matter of fiscal necessity; improving the quality of public services to better meet the needs of the people and the communities they seek to support. The Independent Review of Adult Social Care has been set up in the knowledge that there is more work to do to achieve these ambitions.

Housing and homelessness

In the intervening years since the Christie Commission, the integration of health and social care has been introduced and the contribution that housing plays in achieving better health and social care outcomes has become more widely understood. Indeed, health, housing and social care can be thought of as the legs of a tripod that need to be equally visible and valued: good housing produces better health and social care outcomes for people.

Although housing has not yet secured a strategic role within integrated partnerships there have been significant strategic developments in housing at a national level which contribute to the health and wellbeing of those who need help to live independently:

¹ <https://www.gov.scot/publications/commission-future-delivery-public-services/>

- A determination to end homelessness has led to the development of the Ending Homelessness Together Action Plan² and the promotion of a rapid rehousing approach to help prevent the damaging consequences of experiencing homelessness.

- The Housing 2040 vision and route map³ was launched in March 2021 and means that now is a good time to align social care and housing policy for the decades ahead. Housing sector leaders took part in the Social Renewal Advisory Board throughout the COVID-19 pandemic and the recommendations of the January 2021 report reflect the contribution that housing can make to the lives of people who face disadvantage, including those with social care needs. **The Independent Review of Social Care**

The review overall is about a true system overhaul and not just small tweaks to services and methodology and the report is built on three core and bold propositions:

- Shifting the paradigm
- Strengthening the foundations
- Redesigning the system

The review board has worked incredibly quickly and has engaged with a wide range of stakeholders. The resulting recommendations have been agreed by the Scottish Government and plans are already being developed to implement those associated with the Fair Work convention.

Initial reactions

The Review's consideration of human rights; how to ensure choice and control by those requiring care and support; fair and transparent access to social care and the need to improve conditions for the workforce are all areas that are well received and wholeheartedly supported across the sector. Systemic change is required but the challenge will be to avoid protracted debate and planning around a new structures – something which has hampered the integration of health and social care.

This initial report has focused on social care and refers to housing in passing rather than strengthening the essential links with social care in detail. Somewhat surprisingly, there is no mention of homelessness despite 8% of people in Scotland being affected by homelessness and the experience of homelessness known to impact negatively on health and wellbeing. We are disappointed that whilst examples of lived experience from people facing homelessness were submitted to the Review none were included in the report. Moving forward it is hoped that housing and homelessness will to be an integral part of the Review as plans and frameworks are developed.

There are few references to housing support as such and the extent to which housing support is considered to be part of 'social care support' – the term used in the report – is not clear. The sector would welcome being part of some further discussion on this aspect of the report.

² <https://www.gov.scot/publications/ending-homelessness-together-updated-action-plan-october-2020/>

³ Housing 2040, March 2021, Scottish Government <https://www.gov.scot/publications/housing-2040-2/>

The rest of this paper considers the report by each chapter, highlighting those areas that particularly resonate with housing support providers and considers ways we can further contribute to the work of the Review along with some key messages.

Chapter One: What we heard

The report sets out many areas of concerns that resonate with those involved in the planning and delivery of housing support – from overly stringent eligibility criteria and a focus on crisis rather than prevention to a workforce struggling to achieve parity with professionals in health and social care. The result is a comprehensive set of topics which are then dealt with throughout the rest of the report.

Chapter Two: The purpose of social care

The suggested vision for social care resonates well with housing support; focusing as it does on human rights and the choice and control that those who need social care support must be able to exercise:

'Everyone in Scotland will get the social care support they need to live their lives as they choose and to be active citizens. We will all work together to promote and ensure human rights, wellbeing, independent living and equity.'

The gap between legislation and implementation is set out as something which the development of a National Care Service must seek to address early on through a national vision and development of a national infrastructure.

How we can help

Housing support focuses on preventing crises and enabling people to live their lives to the full. We welcome the review's focus on prevention and can help to set out how this can work in practice.

The crucial role of the social care workforce – and housing support staff are part of this workforce - is recognised but the housing support workforce can be left behind. This has been in evidence during the response to the COVID 19 pandemic when some parts of the housing support workforce were not initially included in staff testing and staff vaccination was not always been made available as part of the social care workforce. We welcome the opportunity over the next few months to examine and comment on the plans developing around the social care workforce

Chapter 3: A human rights based approach

What resonates with housing support:

- Delivering a rights based system where supported people co-produce their support plan.
- Unmet needs should be recorded and fed into strategic commissioning processes.
- Preventative and low level support should be supported and funded.

- Care and support should be more portable so that when people move home they can retain that support.

Housing and housing support can help to:

Enable all those who need support (regardless of tenure) to access it in a timely fashion so as to prevent future reliance on institutional care; risk losing their home or resort to using of acute health services which could otherwise have been avoided.

Ensure that all those people who are currently in institutional care on a long term basis because of complex needs have an opportunity to live in their own home with the necessary care and support arranged around their needs and aspirations.

We would welcome some discussion about the social care needs of asylum seekers⁴ although we acknowledge that reserved powers makes this a complex issue.

We would welcome specific reference to the fact that some people facing homelessness will have lifetime social care / support needs and that provision will be made for these through the National Care Service.

Chapter 4: Unpaid Carers

What resonates with housing support:

- An understanding that caring for someone, whether a family member, friend or neighbour is a normal part of life and that the extent of that caring should be decided by the carer rather than being left with no option.
- A recommendation that carers should have access to support in their caring role and should have a right to respite through a new amendment to the Carers Act.

What housing support can offer:

When developing housing support plans the needs of carers can be considered and provided for.

Chapter 5: The case for a National Care Service

What resonates with housing support:

- The rejection of a nationalised service whereby all provision is taken into public management.
- The important role of the third and independent sectors is recognised.
- The responsibility for adult social care is to shift from local authorities to Scottish Ministers. The aim is to improve consistency, quality and equity of experience of those being supported and improvements in the conditions and training of the workforce.

Initial reaction:

⁴ [New Scot's Strategy 2018-2022](#)

Whilst we welcome the plan to develop a National Care Service 'the devil will be in the detail' and we encourage a focus on implementation. Experience of the role of HSCPS in commissioning housing support varies across the country and further detail will be required before some providers develop a view as to the merits of shifting responsibility from LAs to HSCPs.

There clearly needs to be further thought into how local decision making and planning at an individual and a service level will be supported by the national structure. Access to good quality, personalised services depend on this and, of course, other services that social care needs to work in partnership with, such as housing, will remain within the remit of the local authority.

There are disconnects at all levels of the public sector (Audit Scotland reported recently on a lack of connection between housing, health and social care⁵) but we can help to shine a light on the connections.

The funding of housing does not currently facilitate involvement / buy in from health and social care – this is something that could be examined further as part of the review. Funding for housing is hard to track⁶ and is complex eg housing adaptations funded through 3 sources depending on housing tenure

Chapter 6: A National Care Service for Scotland – how it should work

What resonates with housing support:

- Integration Joint Boards will be reformed and, if deemed necessary, could be reduced in number.
- Regulation bodies, such as the Care Inspectorate and the Scottish Social Services Council will come under the National Care Service. In the case of the Care Inspectorate, this will present an opportunity to take full account of the commissioning and funding arrangements of services when considering their quality and outcomes.
- The development of a new set of health and social care outcomes is being considered to create a simpler way of measuring the progress of IJBs.

What housing support can offer:

Scotland is a small country and the system could and should be simpler. We have an interest in the plans for reforming IJBs as these will impact on social care support in housing. In particular we have an interest in promoting the role of housing within the reformed IJBs and to ensure that when developing plans the question 'how does this impact on housing?' will be routinely asked.

We would welcome involvement in any review of how data will be used by the National Care Service to improve the commissioning and quality of services.

We can help to inform a shift to outcomes focused commissioning and reporting.

⁵ [Audit Scotland's report on affordable housing in 2020](#)

⁶ [Audit Scotland's report on housing in 2013](#)

Chapter 7: A new approach to improving outcomes – closing the implementation gap, a new system for managing quality

What resonates with housing support:

- A recognition that self-directed support has not been implemented as it should have been and a recommendation that a National Improvement Programme for Social Care should focus on self-directed support to improve the experience of people using services.
- The recognition that commissioning and procurement must be improved “to provide a vehicle for raising the quality of social care support” and enhancing conditions for the workforce.

Key ask:

That we are involved in the design of the National Improvement Programme. Providers of housing support are experienced in using reflective practice and outcomes data to help plan service improvements.

Chapter 8: Models of care

What resonates with housing support:

- A recognition that there has been innovation in Scotland for the past 30 years involving housing and community based services but that more needs to be done to support these at scale.
- The importance of housing adaptations as an investment
- The role of Technology Enabled Care can be significant but a person’s needs, rights and preferences must be promoted through the support planning process.
- The recognition of the fundamental role social connections play in our lives and in promoting wellbeing.
- The role of housing as one of the key services that health and social care need to work with – particularly in terms of professionals working together to achieve ‘a more holistic and person centred care’.
- Investing in social care support models that enable people to stay in their own homes and communities in a way which enables people to make their own decisions.

What housing support can offer:

There has been much innovation in the models of housing with care and support and these have been recently set out in the Scottish Federation of Housing’s briefing on Models of Housing with Care and Support⁷.

⁷ [Models of Housing with Care and Support, SFHA, October 2020](#)

Chapter 9: Commissioning for public good

What resonates with housing support:

- We support the recommendation to pause the procurement of social care support. Procurement processes have put much financial pressure on housing support services over the last 25 years resulting in providers having to withdraw from unsustainable provision⁸.
- We welcome the recommendation that procurement use more collaborative approaches and find alternatives to competitive tendering. The insistence that commissioning and procurement methods are adapted to ensure a better paid workforce. We welcome the recommendation of moving away from competitive tendering and by doing so promote mutually supportive provider networks.

What housing support can offer:

The Unit has already contributed to the development of the CCPS Big Ideas referred to in the report and will continue to discuss them in the context of improving commissioning and procurement arrangements for housing support and those using housing support.

We welcome the development of national minimum quality outcome standards to improve commissioning and procurement decisions and would hope to contribute to their development.

Chapter 10: Fair Work

What resonates with housing support:

We agree that the recommendations of the Fair Work Convention⁹ should be implemented swiftly. This should help to address the disparity between pay for health and social care support workforces – something which has become all the more apparent with this year's national pay awards¹⁰. Retention and recruitment into the housing support sector continue to be a concern and further detail will be welcome as to how these issues will be addressed.

Key asks:

Full recognition of the housing support workforce as part of the social care sector – regardless of whether it is commissioned by HSCPs or by local authorities. During the COVID-19 pandemic some types of housing support (particularly homelessness services and sheltered housing commissioned by local authorities) face particular challenges in accessing financial support; staff vaccinations and staff testing. We have seen under the current system that housing support services commissioned by local authorities have sometimes missed out on funding for the Scottish Living Wage. We are looking for reassurance that this would not continue under the new National Care Service.

⁸ [Business Resilience Survey, CCPS, 2018](#)

⁹ [Fair Work in Scotland's Social Care Sector 2019](#)

¹⁰ Health staff have been offered 4% increase whilst social care staff have been offered 2.2%

That the profile of the housing support / supported housing workforce as key workers and social care professionals is raised.

We ask that full account is taken of the need to retain a degree of flexibility in social care roles when undertaking the recommended national job evaluation of social care.

We also ask that there is discussion with employers where housing support roles operate in conjunction with non social care roles so that the full impact of any changes to pay for social care workers can be thought through and planned for.

Chapter 11: Finance

What resonates with housing support:

- A recognition that in the current system costs arise due to a focus on crisis management rather than on prevention or early intervention and an acknowledgement that these costs are borne by individuals as well as public bodies. Some of these additional costs could be avoided and put to better use to achieve improved outcomes for individuals and their families.
- We welcome the reframing of social care support away from a narrative of burden and cost and recognises it as an investment.
- We welcome the fact that housing support has been included in the cost estimates of funding the Real Living Wage and additional estimates of increasing pay to £15 per hour.
- We welcome the recommendation that additional investment will be directed at lower-level support and preventative community support.

Key ask:

Clearly there needs to be more detail and discussion about how the National Care Service will be funded. Housing support providers are wary of plans that do not set out how this will be done as they have had experience of service cuts under the guise of 'efficiency savings'

Sustainable funding levels after years of competitive tendering and pressure on funding at a time when the Scottish Living Wage and the response to the COVID-19 pandemic have inevitably increased costs.

What happens now?

The Scottish Government has broadly agreed the recommendations and has already begun to plan the implementation of those around the Fair Work Convention. The recently elected government has made a commitment to consult on legislation for a new National Care Service within it's first 100 days¹¹. We would hope that an implementation plan is created setting out timescales and progress indicators. We echo CCPS's call for an implementation board which includes representatives of providers and of supported people.

¹¹ <https://www.gov.scot/publications/priorities-government-statement-26-2021/>

Social Care cannot be dealt with in isolation from wider societal challenges and in particular should not be kept separate from housing and the social care support associated with it.

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