



## **CCPS initial response to the National Care Service for Scotland Consultation**

CCPS welcomes the publication of the Scottish Government's consultation on the creation of the new National Care Service. It represents a significant and long overdue milestone on the road to reform of adult social care.

Earlier this year, the Independent Review of Adult Social Care set out the need for a paradigm shift in thinking about social care. This consultation takes the focus from thinking to doing. It sets out detailed proposals for what the framework set out by Derek Feeley's review team could operate in practice.

Their report also underlined that we have a duty to co-produce our new system with the people who it is designed to support, both individually and collectively. Crucially, alongside the recently established Social Covenant Steering Group, this consultation provides the first step to co-production. The Steering Group says what is needed now is action. We agree – but meaningful co-production is not optional.

Organisations responding to this consultation will understandably be doing so from different starting points, whether as commissioners, providers, those representing the workforce, or, most importantly, people who are supported by social care. At CCPS our starting point is that of third sector providers working not just in the adult social care arena but in children's services, housing, and community justice.

We applauded the efforts of the Review to listen carefully, in particular to people who rely on adult social care support, and to be bold in their response to what they heard. The depth of understanding displayed in the Review was the product of extensive engagement. However, that engagement did not extend to all those in the scope of these proposals. This gap needs to be acknowledged and addressed urgently without impeding progress on implementation.

With this and our earlier responses in mind we will endeavour to provide a comprehensive response to the consultation which reflects the diverse experiences and perspectives of our members, the people who work for them, and the people they support. Our response will focus particularly but not exclusively on a number of key aspects of the proposals.

### **Commissioning and procurement**

We do not believe the current system of commissioning and procurement for adult social care is fit for purpose. We have previously shared thoughts on options for change to that system in our [Big Ideas](#) document. We have used that document to create opportunities for anyone with an interest in improving social care to come together to explore how change can be achieved. We will continue to do so.

During the consultation period we will consider whether proposals for a National Commissioning and Procurement Structure of Standards and Processes for ethical



commissioning provides the basis for meeting our four key tests:

- Will it shift power?
- Will it increase choice and control?
- Will it improve accountability and transparency?
- Will it improve social care sustainability?

## Fair work

In our response to the Review's recommendations, we expressed concern that they did not appear to fully address the cost implications of improving staff pay, terms and conditions. We have said consistently that such improvement is both essential and increasingly urgent, but that it will come at a price, and that there is a need to be ambitious. In responding to the consultation, we will consider whether the proposals for a Fair Work Accreditation Scheme provides the basis for securing those improvements.

## Local accountability

In our response to the Review, we said we believed that there were significant merits in its recommendations for a National Care Service and the associated redirection of responsibilities and resources between integrated joint boards and local authorities. However, we also underlined that any new system must allow for local variation, flexibility, and accountability.

We have subsequently commissioned a series of think pieces focused on how local accountability can best be secured and what it might look like on the ground. We will be publishing them in the coming days. During the consultation period we will consider carefully whether the proposals for Community Health and Social Care Boards can deliver the meaningful accountability to those for whom support is provided.

## Regulation

The consultation proposes that the scrutiny, inspection, and regulation of care services and the workforce should be undertaken independently of the National Care Service. As the membership body for third sector providers covered by regulation, we have a significant interest in this aspect of the proposals.

We agree with the principle of independence. In responding to the consultation, we will be particularly mindful of the need for regulation which is sufficiently focused on outcomes for those receiving support.

## A single national care service?

The Review focused almost exclusively on adult social care. In our response we highlighted the need to join the dots with other services not considered in depth by the Review. In doing so we were not necessarily suggesting that the scope of the National Care Service should include those services but that the implications of any changes for other adult services and children's services needed to be thoroughly considered. We particularly highlighted the need for whole system change hand in hand with the implementation of The Promise.

However, while the proposals in this consultation join the dots, they do so by significantly extending the scope of the National Care Service to those services without detailed prior consultation including with those supported by them. During the consultation we will consider, collectively and individually, whether the plans to bring a wide range of services together under the auspices of a single National Care Service are desirable or workable.



There are a number of factors at play here. For example, are plans to broaden the scope in the interests of those supported by those services, what would it mean for the understanding of social care so clearly articulated by the Review, and what might be the implications for investment? Our members may not be of one view on these matters and will also be providing their own detailed responses.

## Next steps

Derek Feeley's review team said the answer to tomorrow's challenges in social care cannot be more of the same. In our response to the review, we were clear that the status quo is not an option. It is vital that this consultation generates full and open discussion about what needs to change in order to make the review team's vision a reality.

Whatever our respective starting points, our ambition must surely be the same – to create a system fit for purpose in the 21<sup>st</sup> century. And whatever else our various concerns, our shared focus must be on building a care service which enables people to live better lives. It is this which will inform CCPS's response.

