Thank you for giving Quarriers the opportunity to respond to this call for evidence. Quarriers is a Scottish-based charity providing practical care and support for children and adults with disabilities, children and families, homeless young people, people with epilepsy, and carers. Through more than 120 projects in Scotland and south west England, we challenge inequality of opportunity and choice, to bring about positive change in people’s lives.

Our response is focused on those parts of the Bill that have most relevance to our work, which is limited, in the main, to Parts 4 and 5.

The two new scrutiny bodies – SCSWIS and HIS

We broadly support the aims of the Bill, to streamline and simplify the arrangements for scrutinising social care, social work and healthcare services across Scotland. In our opinion, the Bill will go some way toward achieving this, but a more effective approach might have been to incorporate the functions of NHS QIS, together with those of the Care Commission and SWIA, into one single new body, instead of creating yet another scrutiny body with responsibility for health services - HIS. Whilst we appreciate the explanation that the current differences in ethos and working practices between these 3 bodies would result in operational difficulties, it may have been better to delay action in this area until the required organisational development work could have been undertaken. As it currently stands, our organisation will still have to comply with two entirely separate scrutiny bodies and, whilst the legislative intention is that there will be a significant degree of co-operation between the two bodies, in our experience this is seldom a straightforward or entirely successful process.

Registration fees

Great clarity will be required on the registration requirements, as the current Care Commission tiered system has led to confusion, which, in some cases, can result in significant variation between the fees that different providers are required to pay.

We also have concerns that the SWIA and HMIE Child Protection functions are currently centrally funded and are most closely concerned with local authority inspections. If these costs are rolled up with Care Commission fees, to enable SCISWIS to become self-funding, third sector providers could end up paying substantially more. It should be noted that many local authorities currently will not include Care Commission fees in provider grants and would be unlikely to offset any additional costs should these rise.

In addition, there needs to be a much closer link between the degree of scrutiny required for a particular service and the registration fee paid. Organisations that are providing high quality services with few areas for improvement should not be required to pay the same as those that require greater scrutiny and support to bring them up to standard.

Inspection and grading system

The Care Commission has invested a considerable amount of time and resource in developing its current grading system and, likewise, providers such as Quarriers have also expended significant time and effort to understand the new system and embed it into their own processes and procedures. We believe that SCSWIS should retain this system - and continue to develop and enhance it - rather than try to establish a new process.

User involvement

The Care Commission has made significant efforts to promote service user participation in its work, including the Involving People Group. One of the people we support has been involved in this work
since its inception and, over the years, we have seen how a disparate and diverse collection of people who use a multiplicity of different kinds of services has evolved into a cohesive and effective advisory group that has a degree of respect, value and authority not generally found in public service “user groups” and we would not want to see any of this valuable work lost. Whilst a user focus element is included in Part 6 of the legislation, we would also want to see this included as part of the general principles, as well as an emphasis on learning from, and continuing with, current user engagement activities in any guidance issued.

Kate Sanford
Policy Manager