

KINGSTON MENCAP

Understanding learning disability

Affiliated to the Royal Mencap Society

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Dear Simon

Following the stakeholder meeting on 17th January 2007, which I attended with Claire Webley, Community Development Officer for Royal Mencap Society, I am writing on behalf of Kingston Mencap.

We have some grave concerns about the eligibility criteria consultation document: 'Changing the eligibility for adult social care services to improve their effectiveness and to develop preventative services'.

I was disappointed that you were not able to answer the specific questions we asked at the meeting. This letter sets out our concerns and comments and has a number of questions which we would very much like you to answer prior to the Public Meeting on 6th February 2007, which we will also attend.

1. Accessibility Issues

A) Timing: consultation period December 2006 to 18th March 2007

I received the papers on 2nd January 2007 although the consultation period began in December. When this was pointed out at the meeting on 17th January, I was told that papers were not sent out earlier because of the Christmas post. I must assume that no-one else received the consultation papers prior to early January 2007 and obviously those I was expected to forward them to will have received them even later.

This does not allow for a 3 month consultation period.

B) Accessible Consultation Document

The sole document currently available is not accessible to people with a learning disability. You informed me on 17th January 2007 that an accessible document was being prepared and should be ready in 2-3 weeks. I would like to point out that this would further reduce the consultation period. It is surprising that having an accessible version of the document was not a starting point for this process. We believe that 3 months is required for a fair, meaningful and valid consultation.

C) Feedback

Those who have been consulted should have an opportunity to see and understand a draft report before it is formalised and recommendations are made to the Council's Executive Committee.

2. The Five Key Consultation Questions

The questions are posed in such a way as to suggest a particular response. In some places, the literature refers to Royal Borough of Kingston (RBK) as having a preferred way forward.

A) Q1. How should RBK seek to target resources to the most vulnerable?

This is a leading question as it suggests that resources should be targeted to the most vulnerable with the only question being how will this be done? A less leading question would have been 'Should RBK seek to target resources to the most vulnerable? If so, why/how, or if not, why not?'

People with a learning disability are amongst the most vulnerable in our society. Does the question seek to make a distinction between people with profound and multiple learning disabilities and those with a mild to moderate learning disability?

B) Q2. Should RBK offer to meet the 'low' category of assessed care needs?

The word 'offer' suggests that people's needs would not necessarily be met. As RBK currently seeks to meet those with needs in the low risk category, perhaps asking if RBK should *continue* with this would have been a more suitable question.

C) Q3. Should RBK offer to meet the 'moderate' category of assessed care needs?

We have the same comments as for Q2.

D) Q 4 & 5. Should RBK develop a prevention strategy, which sets out the range of information and community services that support people in the community? If so, what should be in a prevention strategy?

The development of a prevention strategy would be a welcome innovation. However, a prevention strategy is likely to be limited to sign-posting people to appropriate services which may have been replaced by the prevention strategy or which will need to be developed in non-statutory agencies. Experience in other areas show that if low needs are not met successfully people's needs expand and become urgent, leading them to entering substantial and critical categories of risk.

It is family carers who bear the brunt of bridging the gap between services and need. Adding to the family carer's burden is counterproductive and not cost effective. The cost of caring in health, employment and financial terms is well documented.

Changes in service provision may result in more families reaching 'Breaking Point'.

Current levels of support from alternative sources which will form the basis of proactive and preventative measures are not likely to be adequate to cope with an increase in demand.

3. Assessments

It is stated that any change would only apply to new service users and that following a re-assessment existing service users would continue to receive services only if they were still required. As an assessment of need is carried out annually, existing service users will continue to be assessed against the old criteria of risk and eligibility for services.

4. Production of Final Report and Recommendations

The consultation period is due to end of 18th March 2007. In addition to the five key questions, people have been encouraged to raise their own questions, make suggestions and offer solutions. The Council's Executive Committee is due to see the final report and recommendations on 20th March 2007. We are unclear how it will be possible to assimilate all of the information you hope to receive in the time available.

On behalf of Kingston Mencap committee and members I would urge you to answer the following questions. I would prefer to have the opportunity to discuss your answers prior to the public meeting on 6th February 2007.

I am sending these questions in advance of the meeting so that you have the opportunity and adequate time to respond.

In order to answer/comment on the five key questions that you pose we need to have the answers to the following questions:

1. Has an accessible version of the consultation document been produced and disseminated and if so how and to whom? This information would help us to make sure every stakeholder has been consulted.
2. Will the consultation period be extended to give people 3 months from the dissemination of the accessible consultation document?
3. Approximately how many people with a learning disability are currently in each category of risk and need and how will this change under the proposed categories?
4. Approximately how many people will be served solely by the prevention strategy and what is the expected effect of this on families?
5. Has the true cost of these changes been considered given that a lack of support for people in the low to moderate categories could lead to people moving into the substantial and critical categories of risk?
6. How will Community Care Services deal practically with effectively running two sets of eligibility criteria for new and existing service users? How does this match the Council's Disability Equality Scheme?
7. How will the report and recommendations for any changes be ready for the Council's Executive Committee on 20th March 2007?
8. Will a draft report be available to those involved in the consultation prior to decisions being made by the Council's Executive Committee?
9. Have the proposed changes been costed to take into account hidden costs, for example, to carers? What provision is being made to support non statutory agencies to develop capacity to provide services of all kinds as part of the prevention strategy?

Look forward to hearing from you.

Yours sincerely

Gill Wood

On behalf of Kingston Mencap Committee