

## Consultation Response Template

**“Prioritising need in the context of *Putting People First*:  
A whole system approach to eligibility for social care”**

**Please fill in and/or tick the appropriate response.**

**Name** Association of Directors of Adult Social Services (ADASS)

**Contact address**

**Postcode**

**Contact Telephone**

**E-mail**

### Freedom of Information

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Information we receive, including personal information, may be published or disclosed in accordance with the access to information regimes (primarily the Freedom of Information Act 2000 (FOIA), the Data Protection Act 1998 (DPA) and the Environmental Information Regulations 2004).

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Are you happy for your response to be passed to other UK Health Departments

*Yes / No (please delete as appropriate)*

Are you happy for your response to be published in a summary of responses?  
*Yes / No (please delete as appropriate)*

- Are you responding:
- as a member of the public
  - as a health or social care professional
  - on behalf of an organisation

If you are responding as a member of the public, please supply the following details:

Job title:

Interest in this consultation:

If you are responding as a health or social care professional, please supply the following details:

Job title:

Interest in this consultation:

If you are responding on behalf of an organisation, please supply the following details:

Name of Organisation: Association of Directors of Adult Social Services

Interest in this consultation: Responsible for implementation

## Consultation Response Template

**Q.1: Do you think the guidance sufficiently integrates the application of eligibility criteria within the new policy context of personalisation, choice and control?**

*Yes / ~~No~~ (delete as appropriate)*

**If not, what changes would you propose?**

The draft guidance sets eligibility in the context of personalisation, choice and control. Much of the guidance is actually an expansion of the principles in the Putting People First Concordat rather than guidance on the application of eligibility criteria.

However, the guidance does not comment on how local authorities can ensure that Resource Allocation Systems are compatible with eligibility criteria. In an effective system people will start to attract points for resources at the point when they cross the eligibility threshold for a particular need.

**Q.2: Do you think the guidance sufficiently outlines councils' responsibilities towards their wider community as well as those individuals with eligible needs?**

*Yes / ~~No~~ (delete as appropriate)*

**If not, what changes would you propose?**

**Q.3: Do you think the guidance sufficiently explains the need for councils to implement preventative strategies as well as the benefits that such strategies can bring?**

*Yes / No (delete as appropriate)*

**If not, what changes do you propose?**

**Q.4: Given the emphasis upon access to universal and preventative services as set out in *Putting People First*, do you think there is still a need for a fourth criteria band (low)?**

*Yes / No (delete as appropriate)*

**Please give reasons for your answer.**

The vast majority of people with low needs will have these needs met though signposting, information and advice, equipment and/or voluntary sector services – this will be the case in authorities that still use this threshold as well as in the majority that do not. People should not have to go through a formal assessment to access these types of service – there should be simple and direct access and good information and advice

**Q.5: Do you think the guidance sufficiently underlines the principles of fairness, consistency and transparency in the process for determining eligibility for social care?**

*Yes / No (delete as appropriate)*

**If not, what changes would you propose?**

Key is the focus in (1) whether threshold is crossed and (2) how to achieve desired outcomes

**Q.6: Do you think the guidance itself is sufficiently transparent and understandable for both health and social care professionals and people seeking support?**

*Yes / No (delete as appropriate)*

**If not, what changes would you propose?**

The guidance is quite wide ranging and includes a lot of things that councils will currently be working towards delivering in accordance with putting people first. Not everything will be available everywhere at this time and we should avoid raising people's expectations. Information about wider services that go beyond eligible services has to be tailored locally. People wanting clear information about whether they are eligible for support from their local council may find it hard to find the relevant 6 pages of the 41 page document.

There is also some lack of clarity about eligibility in relation to need and the different issue of whether people have to make a financial contribution towards the cost of their services.

The guidance actually clearly states the if some one is to have their needs met by admission to a care home, they have sufficient resources to pay for their care and they or their relatives/carers clearly have capacity to make arrangements then the ability to pay can be used as a reason not to provide services.... We are not sure this is the message that PPF would want to give.

**Q.7: To what extent do you think the revised guidance will have a positive impact on equality? Is there anything else that you would like to see in the guidance to manage any adverse impact and to promote positive impact?**

Reiteration of the need to focus on achieving similar outcomes for people with similar levels of need should promote equality of access and treatment.

**Q.8: Do you have any comments about the costs and benefits (monetary or otherwise) that the revised guidance will involve? Do you foresee any impact on local authorities or people seeking support that we have not identified?**

Because of the broad nature of the guidance, cost impacts relate to the implementation of the objectives of putting people first which are not inconsiderable. These costs are likely to present a problem when Social Care Reform Grant ends as authorities need ongoing funding for information and advice services, support, enablement and prevention if these are to be universally available on an on-going basis.