

Proposed Wheelchairs (Short-term access) (Scotland) Bill

Introduction

A proposal for a Bill to ensure the provision of wheelchairs to anyone assessed as needing one on a short-term, as well as on a long-term, basis. The consultation runs from 8 April 2019 to 30 June 2019. All those wishing to respond to the consultation are strongly encouraged to enter their responses electronically through this survey. This makes collation of responses much simpler and quicker. However, the option also exists of sending in a separate response (in hard copy or by other electronic means such as e-mail), and details of how to do so are included in the member's consultation document. Questions marked with an asterisk (*) require an answer. All responses must include a name and contact details. Names will only be published if you give us permission, and contact details are never published – but we may use them to contact you if there is a query about your response. If you do not include a name and/or contact details, we may have to disregard your response. Please note that you must complete the survey in order for your response to be accepted. If you don't wish to complete the survey in a single session, you can choose "Save and Continue later" at any point. Whilst you have the option to skip particular questions, you must continue to the end of the survey and press "Submit" to have your response fully recorded. Please ensure you have read the consultation document before responding to any of the questions that follow. In particular, you should read the information contained in the document about how your response will be handled. The consultation document is available here: [Consultation document Privacy Notice](#)

I confirm that I have read and understood the Privacy Notice attached to this consultation which explains how my personal data will be used

About you

Please choose whether you are responding as an individual or on behalf of an organisation. Note: If you choose "individual" and consent to have the response published, it will appear under your own name. If you choose "on behalf of an organisation" and consent to have the response published, it will be published under the organisation's name.

on behalf of an organisation

Which of the following best describes you? (If you are a professional or academic, but not in a subject relevant to the consultation, please choose "Member of the public".)

No Response

Please select the category which best describes your organisation

Public sector body (Scottish/UK Government/Government agency, local authority, NDPB)

Optional: You may wish to explain briefly what the organisation does, its experience and expertise in the subject-matter of the consultation, and how the view expressed in the response was arrived at (e.g. whether it is the view of particular office-holders or has been approved by the membership as a whole).

The response contained herein is the collective view of the Head of Service that manages the Wheelchair

Please select the category which best describes your organisation

service within Grampian and the Chief Officer for the Aberdeen City H&SC Partnership within which the service is hosted.

Please choose one of the following:

I am content for this response to be published and attributed to me or my organisation

Please provide your name or the name of your organisation. (Note: the name will not be published if you have asked for the response to be anonymous or "not for publication". Otherwise this is the name that will be published with your response).

NHS Grampian / Aberdeen City Health and Social Care Partnership

Please provide details of a way in which we can contact you if there are queries regarding your response. Email is preferred but you can also provide a postal address or phone number. We will not publish these details.

Aim and Approach

Q1. Which of the following best expresses your view of establishing a duty to provide a wheelchair to anyone who has been assessed as having a short-term need for one (defined as less than 6 months)?

Partially supportive

Please explain the reasons for your response.

I am concerned about the financial and logistics/infrastructure impact on any public body receiving this duty.

Q2. What is your view on setting a target for providing a wheelchair to a person who (a) has been assessed as having a short-term need for one and (b) is otherwise ready to use it?

Unsure

Please explain the reasons for your response

Consideration would need to be given as to the realistic infrastructure required or in place to achieve this standard; particularly given remote and rural geography; as well as whether this is working days or across all 7 days of the week.

Q3. Which of the following best expresses your view of where the Bill should place the duty to provide short-term access to wheelchairs to people assessed as needing them?

Duty placed on NHS Boards, but with a requirement to delegate it to Integrated Authorities (Health & Social Care Partnerships)

Please explain the reasons for your response.

In terms of, on which statutory body any duty should be placed, I would suggest HSCPs on the basis that the provision is intended to be generic, standard wheelchairs. HSCPs will already have a transport and stock control infrastructure for such high volume, high frequency provision. Also taking account of page 12, given existing WC services are "currently focussed on long-term need it would be critical that adding the responsibility of short-term need to the remit would not result in delays for those accessing long-term provision." This is another reason for 'protecting' such specialist services from such high volume, high frequency activity.

Q4. Which of the following best expresses your view of how further provision about wheelchair access (e.g. assessment criteria and eligibility) should be made?

Other (please specify)

Please explain the reasons for your response.

Important to ensure agreed national standards to ensure reduction in variation; alongside recognising that standardising may require investment.

Q5. Which of the following best expresses your view of requiring Scottish Ministers to report back to the Parliament on the operation of the legislation?

Duty to report every three years

Please explain the reasons for your response.

Reasonable balance between allowing the implementation to embed given potentially across 31 IJBs.

Financial Implications

Q6. Taking account of both costs and potential savings, what financial impact would you expect the proposed Bill to have?

	Significant increase in cost	Some increase in cost	Broadly cost-neutral	Some reduction in cost	Significant reduction in cost	Unsure
Government and the public sector (including the NHS, local authorities)	X					
Businesses (including makers and suppliers of wheelchairs)						X

Q6. Taking account of both costs and potential savings, what financial impact would you expect the proposed Bill to have?

The third sector (including charities and voluntary bodies supporting those with mobility issues)						X
Individuals (including people with mobility issues and their relatives)				X		

Please explain the reasons for your response.

In my view, implementing such a statutory duty will have a significant additional cost to whichever statutory body is given the duty. This is because the current costings detail Red Cross utilisation which I would consider to be a small percentage of the potential demand should this be a provision available to all. I have marked as unsure for both businesses and third sector as there isn't an option to respond that such a duty could result in more income; for providers because the public body will be buying more wheelchairs and third sector because some IJBs may choose commission such a service via the third sector.

Equalities

Q7. What overall impact is the proposed Bill likely to have on equality, taking account of the following protected characteristics (under the Equality Act 2010): age, disability, gender re-assignment, maternity and pregnancy, marriage and civil partnership, race, religion or belief, sex, sexual orientation?

Neutral (neither positive nor negative)

Please explain the reasons for your response.

I do not think that the current situation or the proposed future duty would have any impact on equality in terms of protected characteristics. However, it would provide this for all members of society and not just those who have the financial or information resources to identify and access from existing providers of such provision.

Q8. In what ways could any negative impact of the Bill on equality be minimised or avoided?

No Response

Sustainability

Q9. Do you consider that the proposed Bill can be delivered sustainably, i.e. without having likely future disproportionate economic, social and/or environmental impacts?

No

Please explain the reasons for your response.

It depends on what is meant by disproportionate. I think there would be significant additional costs to the

Q9. Do you consider that the proposed Bill can be delivered sustainably, i.e. without having likely future disproportionate economic, social and/or environmental impacts?

public body; there would be wider societal benefits in terms of maintaining mobility and access to community during a short-term need but any economic benefits will be difficult to identify and recover to fund the investment required. (e.g. impact on wellbeing, or remaining at work, etc)

General

Q10. Do you have any other comments or suggestions on the proposal?

In relation to page 5, where focus is on a temporary short-term medical need or those with permanent need with a short-term wait before receiving their WC; the latter group would be a challenge in my view because by definition these patients require to be assessed with a range of seating configurations to be arranged – careful consideration would need to be given with expert opinion on whether it is safe to offer a 'generic' wheelchair in the meantime.

I would urge caution on the planning assumptions in regards to the financial implications in page 17 in relation to the fact that British red cross data will be less than the total demand should this be a statutory duty. Based on the data on page 12 and assuming Grampian is circa 10% of Scotland's population – we would be looking at 6,900 short term WC provisions over a 2 year period; circa 3,450 per annum or expressed differently, 66 wheelchairs per week across Grampian and with a length of issue of up to 6 months potentially some modelling would be required around the levels of stock that would be required to service demand. Assuming £150 per wheelchair – it would cost over £250,000 to invest in initial purchase of wheelchair stock assuming an average loan of 13 weeks over the first year (1725 wheelchairs).

The infrastructure of manpower and vehicles to deliver, provide safe use training and recovery when no longer needed would be, in my view, significant for whichever part of the system took this on.

I do not disagree with the case for this provision being made statutory – undoubtedly there will be impacts as described for people with short-term health impairments which would be improved by this provision.

Although under benefits to the system, reduction in delayed discharges is proposed – our local data shows no evidence that this is an issue in Aberdeen city (reference - numerous recent reports on reasons for DDs). Furthermore, the cost savings described are in my view theoretical or opportunity cost savings that are very difficult to release. For example, in order to re-invest to fund the costs arising from such a statutory duty.

Completely support that there would be financial implications for whichever part of the system had the statutory duty. I would view these additional costs as significant.