**How to Respond**

Once you have read the draft Guidance, please provide feedback using this form.

Part A of the form asks for your details as respondent.

Part B of the form asks for your comments on Guidance.

Part C of the form asks for feedback on specific content of the Guidance.

Please complete this form and return to [WFPPMO@gov.scot](mailto:WFPPMO@gov.scot) by Wednesday 23 January 2019.

**PART A: Your Details**

Name: Becca Gatherum

Contact Number / email: becca.gatherum@scottishcare.org

Are you responding as an individual or an organisation? Organisation

Name of Organisation (if applicable): Scottish Care

Date: 22nd January 2019

**PART B: to seek stakeholder comments on the Guidance with particular reference to the questions below**

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| **Q1.** | Proposed move to a 3 year “Full” Workforce Plan publication cycle for NHS Boards and Integration Authorities (through HSCPs)  We consider this to be reasonable. |
| **Q2.** | Introduction of an Annual Reporting Template for completion by NHS Boards and Integration Authorities (through HSCPs) in those years between publication of full workforce plan  As above. |
| **Q3.** | Suggested revised submission timescale -   * 30th September 2019 for Full Plan * 30th September thereafter for Annual Reporting Template   As above. |
| **Q4.** | How should  those HSCPs who have already published 3 year plans synchronise with any new timescale?  No comment |
| **Q5.** | Future NHS Board Workforce Projections process – could an Annual Reporting Template process replace projections in future?  No comment |
| **Q6.** | Suggested roles/responsibilities   * National level * Regional Level * Local Level * Service Level |
| **Q7.** | Mechanisms for inclusion of Independent Contractor, Third and Independent sector representation on Workforce Planning Groups  We are pleased that the Guidance makes mention of the 3rd and independent sector and recognises the planning diversity therein but there is a lack of detail how this planning can be supported and resourced directly or through representative bodies.   Nor does the document describe how local parties like the IJB can be resourced or enabled to underpin and enable this planning in the sectors. Having said that sections 28-31 are good and appreciative of the realities and their call for more systematic and longer term commissioning at least recognises the problem. These should be affirmed and recognised.    I think we need also to underline the critical importance of the two final recommendations    **NHS Boards and IJB (through HSCPs) should ensure that key stakeholders representing Primary Care and Third and Independent partners are included.**    • **Scottish Government will work with Third and Independent sector providers to consider how they can be most effectively represented on local level workforce planning groups.**    In general terms we feel that there is something lacking in the document in relation to contingency planning especially to mitigate the impact on hospital waiting and treatment times. We are concerned that this is illustrative of a lack of knowledge of the social care sector and thus restricts the ability to effectively plan for the workforce.  If there are 36,000 care home beds and 13,450 hospital beds and we continue to see closures of care homes over the next 3 years (which we will) what national and local contingency plans are in place to mitigate the impact of this?  This will have significant impact on the whole system and workforce planning per se. If clinical expertise isn’t being provided in care homes because they simply can’t attract and pay for the staff required, there will be a significant increase in demand of NHS hospital and primary care services.    The associated lack of capacity in home care (as detailed in the recent vacancy rates published last week by SSSC and the CI) will only serve to compound the issues. See  <http://www.careinspectorate.com/images/documents/4766/Joint%20CI%20&%20SSSC%20staff%20vacancies%20in%20care%20services%202017.pdf> |

**PART C: Feedback on Specific Content of Guidance**

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*Please add additional rows for response if required.*

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