
NORTH AYRSHIRE COUNCIL

2nd November 2021

Cabinet

Title: A National Care Service for Scotland - Consultation

Purpose: To seek approval of a response to the Scottish Government consultation on a National Care Service for Scotland

Recommendation: That Cabinet:

- Approves the proposed consultation response to the Scottish Government Consultation: A National Care Service for Scotland attached at Appendix 1
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1. Executive Summary

- 1.1 The Scottish Government is consulting on the proposals to establish a National Care Service (NCS) for Scotland. This paper seeks approval for the proposed response to the consultation. The response highlights that the lack of specific detail contained within the consultation makes it difficult to fully assess the proposed NCS and the effects the creation of such a NCS would have and whether it would lead to an improvement for service users. The consultation paper contains proposals that go beyond what was proposed by the Independent Review of Adult Social Care and as such the underlying justification for the proposals is unclear. The consultation, while acknowledging budget pressures on local authorities, does not appear to have considered granting additional funding to them to provide improved services which is the aim of the consultation.
- 1.2 The proposals involve moving decisions about social care to a NCS which would be a centralised body answering directly to Scottish Ministers and establishing Community Health and Social Board Boards, responsible to Scottish Ministers, in place of the current Integration Joint Boards. The proposals represent a reorganisation impacting on local decision making, accountability and delivery of social care.
- 1.3 The consultation response to the proposals has been prepared after engaging with elected members and is now presented for consideration and approval. The deadline for submitting responses to the consultation is 2nd November 2021 and to ensure that the Council's response is timeously received, it is proposed that the response, if approved by Cabinet, will be submitted with the caveat of it being subject to the Council's call-in period in terms of Standing Orders.

2. Background

- 2.1 The Scottish Government published the consultation “A National Care Service for Scotland – Consultation” on 9th August 2021. The consultation follows on from the Scottish Government commissioned Independent Review of Adult Social Care (IRASC) which was published on 3rd February 2021. The IRASC proposed, amongst other things, the creation of a NCS for Scotland which would be accountable to Scottish Ministers and have responsibility for delivering adult social care. The proposals would bring a range of Council services, as noted at 2.2 below, under the direct accountability of Ministers and should the responsibility for these services change it would represent the biggest change to councils since the Local Government re-organisation in 1996.
- 2.2 The scope of the NCS outlined in the consultation goes beyond that which was recommended by the IRASC. The IRASC was limited to reviewing adult social care in Scotland. The Scottish Government’s proposed scope for the NCS extends beyond adult social care and is a departure from what had originally been discussed with local authorities. The proposed NCS will at a minimum include adult social care services, although it is further proposed to include the following services for which (with the exclusion of healthcare) local authorities are currently responsible for: (a) Healthcare, (b) Social work and social care, (c) Children’s Services, (d) Justice social work, (e) Alcohol and drug Services, and (f) Mental health services.
- 2.3 It is also proposed that Integration Joint Boards (IJBs) would be reformed and become Community Health and Social Care Boards (CHSCBs), being the local delivery body for the NCS. CHSCBs would be accountable to and funded by Ministers. They would have members who represent the local population including carers and local elected members. It is anticipated that CHSCBs would be aligned with local authority boundaries, and they would oversee the delivery of social care and social work services within their local area, whilst also working together across Scotland at a national level.
- 2.4 It is proposed by the consultation that the NCS will develop and manage a National Commissioning and Procurement Structure of Standards and Processes for ethical commissioning and procuring of social care services and supports. CHSBs will be required to comply with those standards and processes and procure within that framework. CHSCBs would have responsibility and authority for planning, commissioning, and procurement of community health and social care and other relevant support. The NCS would be responsible for ensuring CHSCBs’ compliance through oversight of commissioning and procurement processes at a local level. Additionally, the proposed NCS would be responsible for the commissioning, procurement and contract management of national contracts and framework agreements for specialist services including care for people with complex care needs, residential care homes, and care at home contracts.
- 2.5 The consultation sets out the Scottish Government’s plans to improve social care and social services for people, as well as the social care and social services workforce. The plans include proposals to move away from current eligibility criteria to access social care services. There is a proposal to change the system so that prevention and early intervention along with portability of care packages are prioritised, although detailed plans on how that will be achieved are not provided by the consultation. In relation to the social care and social services workforce, the consultation proposes the establishment of a National Social Work Agency, as part of the NCS structure, to have national oversight and leadership over social work qualifications, workforce planning, improvement, training,

continuous professional development and pay and grading within a national framework. The NCS is also proposed to set training and development requirements to support entry to the social care workforce and professional development.

2.6 The consultation proposes that regulation of social care services would be independent of the NCS, however the NCS would be responsible for setting national care standards which would provide the framework for regulation of social care. Scrutiny, inspection and regulation of the Care Inspectorate and the Scottish Social Services Council will be reviewed independently. It is proposed that they will obtain more enforcement powers in respect of the scrutiny of care services and the social services workforce respectively.

2.7A Members' briefing session was held on 19th October 2021, with a briefing paper provided in advance of the meeting. Topics discussed included:

- Concern that the proposals would mean that decisions on policy and strategy for social care services would no longer be made locally, based on the needs and circumstances of local people, but would instead bring a centralising approach with those decisions being taken nationally.
- That keeping local accountability for social care services would result in better services and better outcomes for service users.
- Concern about national commissioning and its impact on Community Wealth Building.
- Discussion on the existing and positive links between Social Services and other local authority services including Education, Housing, Welfare Rights and Environmental Health.
- The relationship between Education and children's social work services playing a key role in child protection and that removing children's social work services from local authorities would increase barriers between Social Work and Education and not improve integration.
- Funding constraints impeding the current system and that better funding would greatly improve the social care system without the need to consider the radical restructuring proposed.
- North Ayrshire's excellent delivery model that implements a whole systems approach with the IJB and services working well across the IJB, Council and Health Board. Improvements to the current nationwide systems could be achieved through both increased funding and learning from the broad North Ayrshire type delivery model. The merits of the current model should be developed and improvements to the current model would deliver a quicker, more accessible solution for service users.
- Implications for local authority funding.
- There was insufficient detail in the proposals on how the proposed NCS would work in practice including:
 - how the NCS would be funded and whether funding would be sufficient
 - how it would improve social care and social services for service users
 - how it would affect those bodies presently responsible for the delivery and decision-making of social care and social services
 - how it would affect the employment status of employees
 - how it would affect local authorities' future role in the delivery of social services and social care,
 - how it would affect interim service provision pending the establishment of the NCS with uncertainty contributing on long-term strategic planning for services and thereby adversely impacting on service users in the short to medium term

- Overall, that any future decisions made by the Scottish Government on social care and social services should be centred around improvements for service users.

2.8 There are some key proposals in the consultation that were considered to be of merit and worthy of further discussion with a view to generally improving the quality of experience for service users, carers and staff, including:

- National improvement of care for people
- National standards including quality and consistency
- Improvement of working conditions, workforce planning, and enhancing training and development for the social care and social services workforce.
- Strengthening the regulation and scrutiny of social care service providers.

2.9 Members agreed with the general proposals for response suggested at the briefing. Those proposals along with comments from Members have been encompassed within the proposed response.

3. Proposals

3.1 It is proposed that Cabinet:

- Approves the proposed consultation response to the Scottish Government consultation A National Care Service for Scotland attached at Appendix 1.

4. Implications/Socio-economic Duty

Financial

4.1 None.

Human Resources

4.2 None from this consultation response.

Legal

4.3 None from this consultation response. However, if the NCS goes ahead as proposed, there will be substantial change to the statutory powers and responsibilities of local authorities.

Equality/Socio-economic

4.4 Scottish Government will assess the outcomes of the consultation exercise for equality, diversity and socio-economic outcomes.

Environmental and Sustainability

4.5 None.

Key Priorities

4.6 If the outcome of the consultation results in the alteration to local authority statutory powers and responsibilities and transferring those to a National Care Service, this will impact on how the Council delivers on priorities for citizens and communities.

Community Wealth Building

4.7 There would be implications for Community Wealth Building from proposals for extensive national commissioning.

5. Consultation

5.1 The Consultation response has been informed by engagement involving Officers and Elected Members. Scottish Government will consult on any actions they propose to take in response to the consultation responses received from members of the public and strategic partners.

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For further information please contact **David McDowall, Solicitor**, on **MS Teams**, and **Claire Kierney, Solicitor**, on **MS Teams**.

Background Papers

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North Ayrshire Council response to A National Care Service for Scotland – Consultation

Overview

North Ayrshire Council (the 'Council') welcomes the opportunity to respond to A National Care Service for Scotland – Consultation (the 'Consultation'), but is disappointed that local authorities were not consulted on the proposed scope of the National Care Service ('NCS') prior to the publication of the Consultation considering the proposals represent the largest reform to Scottish local government for over a decade and the proposed NCS is a significant expansion from the recommendations of the Independent Review of Adult Social Care ('IRASC'). The failure to consult local authorities prior to the public consultation would seem at odds with the requirement contained within European Charter of Local Self-Government at Article 4(6) namely that local authorities shall be consulted, insofar as possible, in due time and in an appropriate way in the planning and decision-making processes for matters which concern them directly. The Council is further disappointed in the short period for response to the Consultation which has provided operational challenges for the Council, particularly during recovery from the Covid pandemic.

The Consultation fails to give any detail on how the proposed NCS would affect local authorities in the interim and long-term. It is therefore very difficult for the Council to give a fully informed view on the proposed NCS as the full impact on the Council is unknown. The Consultation proposes a significant change to the legal duties and finances of local authorities and the role of local authorities would be greatly reduced by the proposed NCS. The questions set by the Consultation appear to be aimed at service users rather than local authorities. As such and considering the impact the proposed NCS would have on local government and our communities, the Council considers it prudent to provide a general response to the Consultation highlighting the areas of concern and implications to the Council and its citizens.

Structure of response

The structure of the Council's response is as follows:

- Section 1 – Ambiguities of Consultation
- Section 2 – Council's views on the scope of the proposed NCS
- Section 3 – Implications of proposed NCS for Local Authorities
- Section 4 – Conclusions

1. Ambiguities of Consultation

- 1.1 In summary, the Consultation does not give enough detail on what the proposed NCS would look like, how it would work in practice, how it would be funded, how it would improve social care and social services for service users, and how it would affect those bodies that are presently responsible for the delivery and decision-making of social care and social services. For example, the Consultation proposes to transfer mental health services from the remit of local authorities to the NCS, although mental health services are wide ranging. It is not confirmed which parts, or if all, of mental health services would be transferred to the NCS. Additionally, the proposals of the Consultation go much further than the recommendations of the IRASC and the basis for doing so is absent from the Consultation. Specifically, the Consultation fails to make the case for why profound restructure is needed to the delivery model of social care and social services to deliver increased benefits for service users. The Council is in support of better outcomes for service users. There are however many assertions made in the consultation with no evidence provided to support. It is therefore very difficult to assess and give a conclusive view on the benefits and pitfalls of the proposed NCS in comparison to the current system. The Council considers that further consultation is required which provides full detail on the proposed NCS. A clear case for the need for such radical change still needs to be made outlining the benefits to service users and how those benefits would be achieved, for a properly considered view to be given.
- 1.2 The Consultation does not address how the NCS would be funded and the extent of funding that would be required to deliver on the aims of the Consultation. As the Consultation itself notes, many of the criticisms of the current system can largely be drawn back to funding constraints. The Consultation refers to an aim to move social care away from being a safety net to being a springboard. However, there is no detail on the proposed funding arrangements to enable this transformational change from the current system. Additionally, it is unclear how local authority funding of social care and social services would be affected in the interim while the Scottish Government holds discussions on the setting up of the expanded NCS plan. Long-term changes to local authority funding are also not addressed by the Consultation and there is no clear picture on how local authority service delivery will be affected across the board resultant of any changes to local authorities funding. The Consultation appears to have given no consideration to possible improvements to the current model including increases in funding and the resultant increased benefits that could provide to service users.
- 1.3 The Consultation does not address how the NCS would be staffed and the impact it would have on local authority employment. The Consultation specifically notes that the proposals do not envisage a wholesale change in employment status for people in the NHS. However, the same is not stated for those working in social care and social work presently employed by local authorities. It is unclear whether it is envisaged that social care and social work staff will shift to being employed by the NCS directly or whether they will remain in the employment of local authorities with services being commissioned from local authorities by the NCS via Community Health and Social Care Boards ('CHSCBs'). Should employees be transferred to the NCS from local

authorities, it is unclear what that transfer would look like as there is no detail in relation to the application of TUPE, pension liabilities and other employment matters provided by the Consultation. It is also unclear whether other local authority services which support local authority social services and social care delivery, such as Procurement, Human Resources, IT, and Legal Services, would be partly transferred to the NCS and how those various support services budgets and service remit would be affected.

- 1.4 The Consultation does not give any detail on what would happen to local authority property which is currently used to deliver social services and social care, and there is no recognition that local authorities could be left with unoccupied properties and a lack of income from those. Equally no steer is given as to what will happen to local authority resources used to provide social care or situations where local authority social work departments provide accommodation in conjunction with other local authority services such as Housing. Additionally, it is unclear how any ongoing leasing agreements for property which a local authority may have undertaken to provide social services and social care would be dealt with and if the local authority would suffer financial detriment resultant of such ongoing agreements.
- 1.5 One of the proposed functions of the NCS is to ensure effective local and national working with other public services, but again there is no detail on how that would be achieved in practice in the Consultation. Part of the argument for a NCS seems to be better integration of social care services by bringing them all under the one overarching umbrella. However, social services do not operate within a vacuum within the local authority. There is a great deal of overlap and joint working with other local authority services such as Education and Housing. Moving Social Work, for example, out with the remit of local authorities would then make joint working among these services more difficult, not less difficult. Most importantly, it could create a complex and confusing system for service users who require to access multidisciplinary services. It is unclear how services which remain in local authorities' remit would link with the NCS to ensure joint working between those services and NCS social services.
- 1.6 Local authorities' future role in the delivery of social services and social care, if any, is uncertain from the Consultation. Such uncertainty can only hinder long-term strategic planning for services and will adversely impact on service users in the short to medium term. As noted earlier, the scope of the proposed NCS detailed in the Consultation is a significant expansion of what was recommended by the IRASC. As such, it is unclear what the evidential basis is for proposing these reforms. The benefit of removing the proposed remit of social care and social services from local authorities to a NCS, and the need to do so to deliver improvements to social care and social services are not addressed by the Consultation. There is also no consideration of what improvements could be made to the current model and how local authorities could be better supported by the Scottish Government to deliver improvements to social care and social services without the need for radical reform. As noted at 1.2 one of the major uncertainties of the Consultation is how the proposed NCS would be funded. The Consultation fails to evaluate if a better solution to investing substantial funding to develop and deliver the proposed NCS would be to increase local authorities funding to improve the current model.

2 Council's views on the proposed scope of the NCS

2.1 The scope of the proposed NCS detailed in the Consultation is a significant expansion of what was recommended by the IRASC. The Council is in favour of the general principal of the IRASC to improve social care both for service users and for the social care workforce, although the Council is not in support of the scope of the NCS as proposed by the Consultation. The Council does not support the transfer of any local authority delivered services to the NCS. The reasons for the Council's opposition are noted in detail throughout this response with the Council's principal argument being that to centralise the delivery and decision making of vital social care and social work services would be contrary to the principle of localism. The Council's view is that legislative and structural change is not necessary to provide the proposed benefits to the delivery of social care and social work services in Scotland. What is needed is further investment and consistent funding into the current system to enable the required improvements to social care and social services to be delivered, coupled with a limited national approach. There are some key proposals in the Consultation that the Council considers meritorious and would improve the quality of experience for service users, carers and staff, noted below:

- National improvement of care for people.
- Improvement of working conditions, workforce planning, and enhancing training and development for the social care and social services workforce.
- Strengthening the regulation and scrutiny of social care service providers.

The Council may support a model of NCS which takes a national approach to improve care for people and the social care and social services workforce with the remit for delivery of social care and social services and commissioning remaining with local authorities as is currently. However, what is proposed at present does not receive the support of the Council. Further detailed consultation on the finalised proposed remit of the NCS would be required before the Council could give a conclusive view.

2.2 As highlighted above, the main criticism of the current system is funding constraint. Social care accounts for a significant proportion of local authority spending and activity and if social care had been adequately funded to date Scotland could have had a thriving social care system without the need to consider restructuring. The IRASC notes that the *"changes proposed would likely not be necessary if more progress had been made by the Scottish Government, Health Boards, Local Authorities and Integration Joint Boards with integration health and social care"*, although there is no consideration of increased funding to local authorities to deliver improvements to social care given by the Consultation. The Council believes that further investment and consistent funding in the current system could deliver the proposed improvements to social care and outcomes for service users without the need for a radical national system. Additionally, the improvements to social care could be delivered much more quickly if the whole of the planned investment funded the development of the current system, opposed to substantial spending on unnecessary restructuring. Ultimately additional and continuous funding into the current system is needed, not a NCS as proposed in the consultation.

2.3 The Council is not in support of the proposal for Integration Joint Boards (IJBs) to be reformed to become Community Health and Social Care Boards (CHSCBs).

The Council presently has an excellent model for delivery of social care and social work services within North Ayrshire and the success of the IJB contributes towards that model. The IJB and the Council within North Ayrshire are very well linked. Our model includes the remit of Children's Services, Mental Health and Justice Services delegated to the IJB. There is also a supportive and cooperative relationship between the three Ayrshire IJBs. Within North Ayrshire, the Council, Health Board and the IJB work effectively across services, which has developed a successful whole systems approach and resulted in an excellent delivery model of social care and social services for the community. Additionally, the Council has a positive relationship with North Ayrshire Community Planning Partnership that again works very well and contributes towards delivering good quality outcomes for and with the community. The Council's view is that further funding to IJBs could result in better integration and delivery of social care services across Scottish local authorities delivering benefits for service users along with direction for the wider model utilised by North Ayrshire to be mandatory in other authorities. It is considered that the solution may be to improve the current model including increased and regular funding, not to change its foundations. The Council would welcome the opportunity to implement improvements to the current system with service users at the centre of all decisions.

2.4 There are considerable concerns around the removal of social care and social work services from the remit of the local authority given the relationship between these and other local authority services. COSLA has summarised those concerns noting, *"Many of the people who access the services included in the Scottish Government's NCS proposals also rely on other services delivered by Local Government, including Housing, Education, Welfare Advice and Employment Support. These essential services cannot be seen in isolation, they work best when they are connected. It is vital that the links between them are preserved if we are to provide the most effective support for people who rely on these essential services the length and breadth of Scotland each and every day."* The Consultation's proposals for a NCS put at risk the vital links that exist across essential services. For example, the relationship between Education and children's social work services plays a key role in child protection. The removal of Children's Services from the remit of local authorities does not appear to have been properly considered by the Consultation given there is a lack of evidence to justify the inclusion of Children's Services in the NCS. No account appears to have been taken of what the proposed changes would mean for children, young people and their families. The reasoning noted in the Consultation for the proposal to transfer Children's Services to the NCS is that it would ensure cohesive integration of health, social work and social care. However, removing Children's Services from local authorities may create greater complexity and poorer integration with the key service of Education. The Council considers that there would be considerable risk to child protection to remove Children's Services out with the remit of local authorities and at an arm's length of Education. In fact, it could be argued that there are greater synergies between Children's Services and Education than Adult Social Care given how closely the Education Service works with Children's Services. The inclusion of Children's Services within the NCS goes far beyond the scope of the IRASC and the argument for the need and benefit to remove Children's Services from the remit of local authorities is unpersuasive. Additionally, the reform to Children's Services proposed by the Consultation risks derailing ongoing work which local authorities are currently conducting which would have implications on service delivery.

2.5 Any change from the current model for the delivery of social care and social services needs to result in an improvement for the service user and not a lesser service. It is difficult to comprehend what improvements to service users the NCS would bring given the lack of detail on how the NCS will be shaped in the Consultation. The Scottish Government's aim is to have the NCS centred around human rights. A human rights-based approach should empower service users to easily access the care they require, yet the Consultation fails to address the implications of the proposed changes for the many people who use essential social care services. Removing social care services that are presently intrinsically linked with other locally delivered services, for example Housing, from local authorities' remit could cause confusion for service users. Service users are used to having these services work together under the umbrella of the local authority and to approaching the local authority for information and assistance. The creation of a NCS could create a confusing system and it is unclear how service users' ability to access multidisciplinary services would be improved with the creation of the NCS.

2.6 The Council's view is that the proposed NCS contradicts the principle of localism and full detail on that argument is noted at 3.2, while specifically in terms of the proposed scope of the proposed NCS, the Council considers that a NCS with a national approach to procurement of social care and social services completely contradicts the principle of Community Wealth Building. There would undoubtedly be a knock-on effect to local businesses, local employment and local supply chains if procurement of social care and social services was made at a national level. The Council's view is that procurement, as far as legally permissible, should be made locally to develop and contribute towards the local economy and keep wealth within local communities. The proposed NCS does not offer a truly national approach to social care like the National Health Service. What the NCS proposes is to nationalise commissioning with service delivery being procured to private providers. The Council has concerns that this approach could result in competition that drives down standards due to cost saving. Service users should be at the forefront of any decisions made by the Scottish Government on a NCS, and the Council is not satisfied that centralising commissioning of social care and social services would result in a better social care service for people in its communities.

3 Implications of proposed NCS for Local Authorities

- 3.1 As noted previously, the lack of detail within the Consultation makes it difficult to assess the implications for local authorities of the proposed changes. The uncertainty this causes, is, an issue for local authorities when they should be focussing on recovering from the Covid pandemic. With the creation of the proposed NCS local authorities would lose their decision-making role in determining priorities for social care involvement in their area. Transfer of some (if not all) of social work functions from local authorities would involve transferring the multiple statutory responsibilities and change ways of working that have been long established. This would inevitably be very costly and time consuming to implement, both at government and parliamentary level to ensure that the drafting, consideration and finalisation of the requisite legislation and regulations are in place as well as setting up the necessary structures, including recruitment and systems. At local authority level it would also be costly and resource intensive to implement particularly at senior management level. This risks distracting from the provision and improvement of services while any changes are undertaken.
- 3.2 Having a NCS means that decisions on policy and strategy for social care services would no longer be made locally, based on the needs and circumstances of local people, it would instead bring a centralising approach with those decisions being taken nationally. COSLA has said that the proposed NCS, *“cuts through the heart of local governance in Scotland – not only does it have serious implications for Local Government – it is an attack on localism and on the rights of local people to make decisions democratically for their place.”* The Council’s belief is that social care services should be designed and delivered as close as possible to the people who use them on a daily basis, not centralised. The Council considers that keeping local accountability for social care services would result in better services and better outcomes. The United Nations Charter of Local Self-Government, which was ratified by Government on 24th April 1998, states public responsibilities shall generally be exercised, in preference, by those authorities which are closest to the citizen. A NCS would seem to contradict this principle by centralising decisions on local care needs rather than allowing those decisions to be made at a local level. This apparent contradiction may mean that the proposals could be subject to time consuming and costly legal challenge. The NCS would also seem to contradict one of the key principles of the Christie Commission, namely: Recognising that effective services must be designed with and for people and communities - not delivered 'top down' for administrative convenience. A NCS answering to the Scottish Ministers would clearly be a “top down” method of delivery for social care.
- 3.3 There are also concerns that reducing the capacity of local authorities exposes civil emergency arrangements to new risks. The Coronavirus pandemic saw local authorities in conjunction with local partners, the third sector and communities supporting the immediate response and leading the recovery of social care within their local areas. The Consultation does not consider the impact the NCS would have on future local, regional, and national civil emergency responses.

4 Conclusions

- 4.1 Throughout this response, the lack of detail which has been provided in the Consultation has been noted. Without specific detail to allow for informed consultation this Consultation is at best premature. Much of what is proposed goes far beyond the IRASC and as such, the underlying justification is unclear. No consideration appears to have been given to the alternative position of better funding local authorities to enable them to provide the improved service that is the aim of the consultation. Any new NCS would need to be significantly better funded than local authorities are at present to implement the recommendations proposed by the IRASC. When this is coupled with the cost, complexity and time required to set up the NCS properly it is difficult to see how this could provide better value than the current system, if funded appropriately.
- 4.2 While there may be some benefits from introducing a NCS with scope limited to nationally improve care for people and the social care and social services workforce, the Council cannot support a more wholesale change. Moving decisions about social care to a centralised body answering directly to Scottish Ministers completely cuts across the principle of localism. A “one size fits all” approach must be avoided. The council believes that decisions about priorities for social care are best made locally by people who understand the needs of the local communities. Continuing to have care provided by local authorities would allow this to happen and would involve a much greater degree of local accountability. While it is important to share and learn from best practice, decisions on local priorities are best made closer to the communities they affect rather than by a centralised body.
- 4.3 Ultimately the Council’s view is that what is needed to deliver improvements to social care and social services is increased and continuous funding for local authorities and IJBs. The Consultation does not make the case for the need for the implementation of the proposed NCS to deliver outcomes for service users. The proposed NCS would not come without its own issues, including risks of a competitive led and confusing model. There would additionally be interim issues during the transition of services from local authorities to the proposed NCS which would only result in inconveniences and uncertainties for service users. Improvements to the current model would deliver a quicker, more accessible and better solution for service users. The merits of the current model should be developed, not dismantled and reinvented.