

Submitted to **1. Summary survey**

Submitted on **2019-11-13 10:39:09**

1. What Scotland needs to do

1 What do you think about the ideas in this section?

I like the ideas

Why do you think that?:

The RCOT is generally in broad agreement with the proposals in section 1, in particular the move to embracing the social model of disability and using a human rights perspective to frame this.

2 Could these ideas be made better?

Not Answered

How could these ideas be made better?:

2. How we understand autism, learning disability and mental health

1 What do you think about the ideas in this section?

I like the ideas

Why do you think that?:

The RCOT supports autism and learning disabilities being defined as disabilities rather than as mental disorders and using the social model of disability to create positive change. Occupational therapists are trained to approach their practice from this perspective and advocate for tackling the causes of disability which are due to barriers in the social and physical environment.

2 Could these ideas be made better?

Yes

How could these ideas be made better?:

We agree that all systems, processes and workforce need to move to embrace positive risk taking. In our experience, risk assessment can result in the person being denied the opportunity to engage in their chosen occupations. We have found that providing our members with more in-depth tools to promote positive risk taking is helping to change practice. We have produced a document called "Embracing Risk, Enabling Choice –Guidance for Occupational therapists" (RCOT,

2018) which could be used as the basis for wider guidance for the whole workforce.

3. Support for decision making

1 What do you think about the ideas in this section?

I have mixed feelings about the ideas

Why do you think that?:

The RCOT would like clarification about whether the Review regards occupational therapy as a psychological intervention. Our opinion is that we are an

occupational intervention rather than a psychological one, but we are aware that SIGN guidelines 145 include occupational therapy under the category of

behavioural/psychological interventions. If it is categorised in this way, we will also need clarification about whether a human rights assessment would be required

before occupational therapy interventions.

2 Could these ideas be made better?

Yes

How could these ideas be made better?:

The RCOT are firm supporters of the STOMP pledge and feel that a proactive campaign could also work in Scotland. Giving personal pledges has enabled each

professional group to define their contribution in this area. For example, the RCOT committed to support members to include the reduction of medication in care

plans; to challenge the use of medication and to encourage increased access to meaningful occupations during the reduction of psychotropic medication. Giving

clear, tangible examples such as these can help promote change in the workforce.

4. Support, care and treatment

1 What do you think about the ideas in this section?

I like the ideas

Why do you think that?:

The RCOT support the theme of giving people with autism and learning disabilities the right to access support, care and treatment. We also support the proposal

to create a new National Autism Service and have occupational therapists in England and Wales who have specialised in working with people with autism.

2 Could these ideas be made better?

Yes

How could these ideas be made better?:

The RCOT would like the opportunity to be included in further discussion about the creation of a National Autism Service as we believe we have members who have the skills and expertise to contribute to this service. For example, reports we have released this year contain several case studies of occupational therapists supporting people with autism to achieve their goals in the community. “Making personalised care a reality; the role of occupational therapy” (RCOT 2019) contains Thom’s story who works with an occupational therapist to join the local running club which resulted in him winning a junior trophy in the park run. They did this through one-to-one coaching sessions so Thom could become familiar with the environment, learn skills for personal relationships and manage personal care and transport.

5. Where support, care and treatment happens

1 What do you think about the ideas in this section?

I like the ideas

Why do you think that?:

The RCOT supports the right to independent living and this was a major theme in our recent publication “Leading fulfilled lives; occupational therapy supporting people with learning disabilities” (RCOT 2019). The document describes Ian’s story, who was housed in a specialist forensic rehabilitation unit far from home. The occupational therapist was able to advice about suitable housing nearer his mother and he was discharged to a rented property. We also agree that secure support centres could be led by occupational therapists who can take a personalised approach to care.

2 Could these ideas be made better?

Yes

How could these ideas be made better?:

We agree that Scotland will need more investment in community based professionals and support and would like to ensure that occupational therapists are included in this. Our report above states that occupational therapists should be positioned to:

- Develop wider partnerships to create access to opportunities in education, work and leisure

- Provide advice and training to families and service providers
- Provide clear access points for partners and service providers to utilise advice and guidance from occupational therapists

6. How professionals make decisions

1 What do you think about the ideas in this section?

I have mixed feelings about the ideas

Why do you think that?:

The RCOT supports the idea of having a human rights assessment and special regard for a persons will and preference. However, we have long advocated for role extension for our members and this section does not propose this. For example, there will be some of our members who with additional support and training could provide a human rights assessment. The Human Rights Framework produced in September 2018 already contains categories that are part of an occupational therapy assessment such as standards of living, health and independent living. We understand that the human rights assessment by the Mental Health Officer can include information from occupational therapists and that the Tribunal can invite the occupational therapist to the Tribunal to give evidence and clarify their views. We support both of these proposals but would have liked them to go further.

2 Could these ideas be made better?

Yes

How could these ideas be made better?:

We would like further clarity about how occupational therapy support, care and treatment may be considered and authorised under the proposed new criteria. We would also like clarity on how professionals will carry out a human rights assessment in an emergency situation. Our members are more frequently working in crisis services and will need further guidance.

It is our understanding that occupational therapists, nurses and social workers can already be care managers so are unclear why these are termed “new roles” in the review. We support our members who wish to act in this role.

We disagree that the shift towards the social model of disability and a human rights perspective should be driven solely by social work and social care. The right levers need to exist within in the health system itself to embrace wide scale change. Occupational therapists for example, are embedded throughout the health

and care system and will be allies in this paradigm shift.

The Responsible Clinician role in England and Wales also names occupational therapists in the Regulations alongside psychologists, nurses and social workers.

We are aware of two such occupational therapists, one in Wales and one in England who act as Approved Clinicians and who have shown the ability to provide

“objective medical expertise”. We have received anecdotal evidence from our members that they feel they have been prevented from moving into new roles due

to attitudinal barriers in predominantly medicalised systems. It seems that despite nurses, psychologists and occupational therapists, albeit in small numbers,

demonstrating their advanced competencies and skills, that this review does not include any proposal to change either the Mental Health Officer role (social

worker) or the Responsible Officer role (medic), which we regard as a missed opportunity.

7. How decisions are monitored

1 What do you think about the ideas in this section?

I like the ideas

Why do you think that?:

RCOT supports the shift towards a zero tolerance towards restraint and seclusion which are incompatible with human rights.

2 Could these ideas be made better?

Yes

How could these ideas be made better?:

The RCOT supports the proposal to set up a second opinion professional service and would like this to be open to all professionals with the right competencies and skills.

8. Offenders

1 What do you think about the ideas in this section?

Not Answered

Why do you think that?:

The RCOT supports the proposals for registered intermediaries, rehabilitation centres and support for fair access to rehabilitation and community based sentences.

2 Could these ideas be made better?

Yes

How could these ideas be made better?:

Occupational therapists are working in similar schemes in England and would like to be considered for inclusion as registered intermediaries who support people who have been charged with a crime.

We also believe that appropriately designed rehabilitation centres could be the new model for detention, particularly if occupational therapist are involved in the design and delivery of these. Successful outcomes have been achieved involving occupational therapists in the design of new environments that offer the opportunity for skills development in a protected environment such as forensic settings. This has enabled a balance of safety and the need for environments that support social interaction, activity and personal choice.

9. Where support, care and treatment happens for offenders

1 What do you think about the ideas in this section?

Not Answered

Why do you think that?:

RCOT support the proposals to support people to live in the community and the need to set up rehabilitation centres in Scotland for offenders with learning disabilities and autistic offenders.

2 Could these ideas be made better?

Yes

How could these ideas be made better?:

As previously stated, we believe that occupational therapists could play a vital leadership role in these rehabilitation centres, in the screening and diagnosis of all offenders and in the design of rehabilitation centres.

10. What this means for the law

1 What do you think about the ideas in this section?

I like the ideas

Why do you think that?:

The RCOT support the proposal for a new law to encompass and enact the vision of the Review.

2 Could these ideas be made better?

Yes

How could these ideas be made better?:

However, we are concerned that if the right to independent living is placed outside the scope of this law it will delay progression in this area. Settled

accommodation is a key feature in reducing re-offending rates and is crucial to move people out of secure environments.

We also support the Review's final comments about the need for the Scottish Government to be tied to a clear commitment to resource the services that people

need to end detention. This will essentially mean an increased for resources for community services and will need to include clear and definite workforce plans.

None of the proposed changes will happen without thorough workforce considerations.

About you

1 What is your name?

Name:

Genevieve Smyth

2 Are you taking part as an individual person, as a professional or as a group of people?

A Group

3 Do any of these apply to you?

None of the above

4 If you are taking part as a professional, what is your profession?

Profession:

5 If you are taking part as a group, what is the name of your group?

name of group:

Royal College of Occupational Therapists

6 Do you live in Scotland?

Not Answered

7 Do you want us to publish your response?

Yes please publish my response anonymously