

SUBMISSION FROM NHS Lothian

Section 1

1. The position of the Scottish Government health department is that a revised strategy can be delivered without resorting to legislation to underpin it.
2. Many of the specific issues that the private members bill seeks to address are already being delivered through response to the 2002 Public Health Institute's report. For example in Edinburgh there is a one stop shop that provides services across Lothian including information, training, socialisation and employment coaching to adults on the autistic spectrum.
3. All Lothian local authorities, alongside NHS Lothian, contribute to the core funding of this service in direct recognition of the support given to people on the autistic spectrum to maintain their health and wellbeing.
4. Within NHS Lothian, supported by the Learning Disability Managed Care Network (MCN), there is a Regional Autism Spectrum Consultancy Service for adults aged 18 and over. This service provides diagnosis, assessment and advice to individuals, plus supports training liaison with local services supporting individuals and their families across the MCN area, ie Lothian, Fife, Forth Valley and Borders.
5. However, in recognition that people with autistic spectrum disorders (ASD), particularly people with high functioning ASD, do not feel well supported by existing services, NHS Lothian welcomes the renewed focus nationally and supports the development of a revised national strategy.

Sections 2 and 3

6. Subsequent guidance, to advise on national standards for information and/or services to people with ASD and their families would be welcomed, however, it is the opinion of NHS Lothian that this does not require to be framed in statute.
7. As noted in the section below re the content of the Policy Memorandum, the ambition for the content of the guidance is of some concern given the potential costs involved.

Sections 4 and 5

8. There are no particular comments or recommendations to be made in relation to these sections.

Policy and Financial Memoranda

9. The Financial memorandum accompanying the Bill only makes reference to the actual costs of the production of a national strategy and guidelines, including consultation.
10. The Bill requires that guidance is issued to all local authorities and health boards with specific requirements around the planning of services, training of staff who provide relevant services and provision of services. The Financial Memorandum does not address the likely cost implications that could be incurred through implementation of this.
11. The Bill and the accompanying documentation makes reference to statements from the National Audit Office which suggests that investing in the support of 4% of people with high functioning autism will, over time, become cost neutral. However, this is across public services funding in its widest sense and will not necessarily provide a “spend to save” opportunity for the discrete health board or local authority.
12. Given this, it is the view of NHS Lothian that the Financial Memorandum is not particularly helpful in addressing the full implications of the implementation of the Autism (Scotland) Bill, if enacted.
13. With regard to the Policy Memorandum, this sets out a range of areas where it claims current practice or availability of services is poor.
14. The content of the Memorandum is far more explicit and pro-active than the Bill proper and the inference is that these areas should be addressed in a national strategy and subsequent guideline. If this were the case, the implication for local authorities and health boards would be to see the provision of support to address explicit support for autism in schools, to manage transition into adult services, to access and maintain employment, to receive an early diagnosis, and have the opportunity to access specific healthcare to address the impact of autism. Given the above statements in regard to the Financial Memorandum, and recognising the fiscal climate that will be with public services for a considerable period, this is an extremely ambitious agenda, and one that if protected through legislation, will discriminate against other disability groups.

Consultation prior to the introduction of the Bill

15. The Consultation undertaken in January 2010 was helpful, and NHS Lothian was pleased to have the opportunity to submit response at that early stage in the process.

16. Specifically from an NHS Lothian perspective, we would recommend that—

- NHS Lothian welcomes the renewed focus nationally, and supports the development of a revised national strategy;
- NHS Lothian does not support the need for additional legislation;
- NHS Lothian supports further work being undertaken at a national level on the economic costs of autism within the Scottish context for both NHS Boards and local authorities.

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