



UNIVERSITY of STRATHCLYDE
**FRASER OF ALLANDER
INSTITUTE**

Social Care Reform in Scotland: context, costs and questions

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1 Introduction

“the story of adult social care support in Scotland is one of unrealised potential”

Derek Feeley, Chair of the Independent Review of Social Care

Social Care, as defined by the Scottish Government, comprises “all forms of personal and practical support for children, young people and adults who need extra support. It describes services and other types of help, including care homes and supporting unpaid carers to help them continue in their caring role.”ⁱ

For many people, this serves more as a statement of intent than the reality they face. The policy memorandum talks about a “gap between legislative intent and delivery that has been experienced historically in this area”ⁱⁱ. The National Care Service (NCS) is the latest attempt to change this.

The Scottish Government’s vision for the National Care Service is that it willⁱⁱⁱ:

- enable people of all ages to access timely, consistent, equitable and fair, high-quality health and social care support across Scotland
- provide services that are co-designed with people who access and deliver care and support, respecting, protecting and fulfilling their human rights
- provide support for unpaid carers, recognising the value of what they do and supporting them to look after their health and wellbeing so they can continue to care, if they so wish, and have a life beyond caring
- support and value the workforce

- ensure that health, social work and social care support are integrated with other services, prioritising dignity and respect, and taking account of individual circumstances to improve outcomes for individuals and communities
- ensure there is an emphasis on continuous improvement at the centre of everything
- provide opportunities for training and development, including the creation of a National Social Work Agency providing national leadership, oversight and support
- recognise the value of the investment in social care support, contribute to the wellbeing economy, make the best use of public funds, and remove unnecessary duplication.

Few could disagree with the vision, but how will this be achieved – and funded?

This briefing note pulls together analysis from a range of areas that the Fraser of Allander have been analysing over the past 6 months with funding from the Coalition of Care and Support Providers in Scotland (CCPS).

The National Care Service Bill does not provide a blueprint for the full reform programme envisaged by the Scottish Government. The financial information that has been worked on by officials and included in the Financial Memorandum only covers what is in the legislation. Whilst there are some gaps (e.g. the integrated health and social care record) and minor queries we have noted in our analysis, on the whole and given the exceptional levels of inflationary uncertainty at the moment, analysis provided by the Scottish Government is reasoned and logical.

There is little information available on the costs of reforms that are outwith the NCS Bill currently laid in parliament. Reforms that will have a direct impact on frontline services and will deliver the much hoped for ‘timely, consistent and high-quality services’ have not yet been developed and are not part of the Bill. Sequencing of reform, and the timing of when the Bill is laid in parliament, is ultimately a decision for Ministers.

Our brief was to look at the totality of reforms. This briefing therefore straddles two elements: analysing the information that is part of the NCS Bill and attempting to piece together information on the likely scale of additional costs associated with the full reform programme. We summarise the scale of some of the key costs here:

- The NCS Bill, which was laid in parliament in June 2022, is mainly concerned with structural changes to accountability and decision making. The cost of these structural reforms for the NCS is estimated to be between **£200 and £600m by 2026-27**.
- The costed carer reforms in the NCS bill are expected to cost between **£16m and £27m by 2026-27** (but are projected to increase to over £130m over the next decade). No costing has yet been produced for the health and social care record which is also part of the legislation.

- The Independent Review of Adult Social Care (published in February 2021) recommended a series of investments to front line services. The costed recommendations, which themselves did not encapsulate all of the reforms that the authors envisaged, were in the region of **£680m a year** (or around £660m if pay reforms are excluded, the figures for which are now obsolete).
- Even if there were no reforms to services, the costs of current provision will increase in real terms. The Scottish Government assumes a 3% rise across social care services for non-inflation related pressures (e.g. demographic change). This would lead to an extra **£700m** being spent on adult social care by 2026-27 (another £200m would come from pressures for children and criminal justice social work services).

The Resource Spending Review in May 2022 confirmed that there was £840m available for social care reform. This should be sufficient to cover the additional costs laid out in the Financial Memorandum, although this depends on the timing and scale of the costs for the integrated health and social care record. However, it does not look capable being able to pay for the totality of reform.

Within the Bill documentation, the Scottish Government state they will put further financial detail in front of parliament as plans develop. Whilst welcome, we note that the scrutiny function of the Parliament outwith primary legislation will be more limited.

The aim of this briefing is to help those with an interest in the NCS to understand the financial information available and to note what is yet to be determined. The subsequent sections of this briefing provide an overview of the adult social care system, and the timeline of events that led to the laying of the NCS Bill in Parliament in June 2022. Our analysis of the Bill is focussed on the financial implications, rather than the policy direction. In the conclusion we offer some thoughts on the big unanswered questions that will need to be answered before we know the full fiscal implications of reform. Until greater detail on costs of reforms are available, we are limited in the extent to which we can estimate potential benefits (both financial and in terms of health and wellbeing). These could be substantial.

Most of our analysis relates to adult social care. This was the focus of the Independent Review of Adult Social Care and at the moment is the only demographic guaranteed inclusion in the NCS. Adults make up the largest part of Scotland's social care system but other groups will bring a different set of requirements and types of costs that will require bespoke analysis once more detail on the Scottish Government's plans are known.

2 Adult social care: facts and figures

People supported

Approximately 221,000 adults drew on social care support in 2020-2021 in Scotland. Adult social care supports older people who require care and support due to their age, and people with physical, mental, and learning disabilities. When it works well it

can allow people to live independently (or as independently as possible) in their community. The level and type of support required will differ significantly depending on the individual. Older age groups are a large part of the client group, but there is also a significant working age group that draws on support (Figure 1).

Expenditure on adult social care

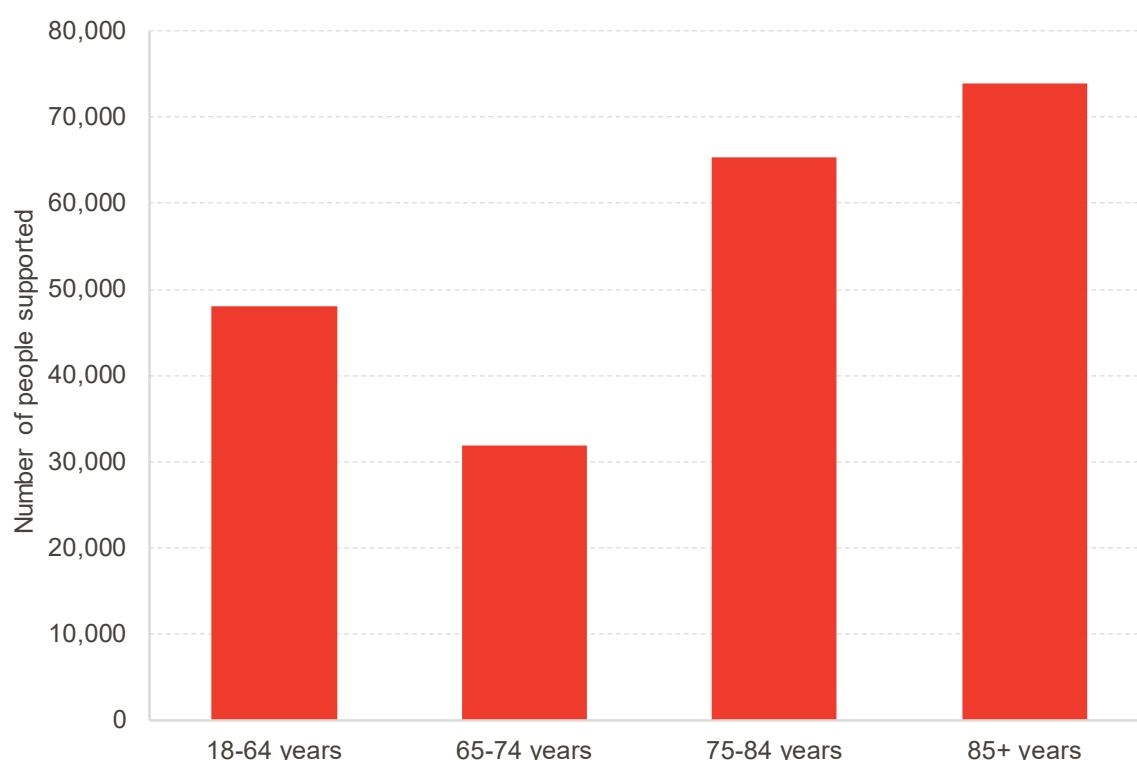
Local government in Scotland currently has responsibility for the provision of social care. Total spending in 2020-21 was in the region of £3.8bn. £2.3bn was spent on social care for those aged over 65 and around £1.5bn was spent supporting the working age population. Adult social care counts for around 20% of local government gross expenditure (total social work services, including children and criminal justice social work, counts for around 40%).

There are fees and charges that produce an income to local government of around £200m a year, but the majority of support is provided through local government resources, a mixture of grants from the Scottish Government plus income raised through Council Tax and Non-Domestic Rates.

Services and providers

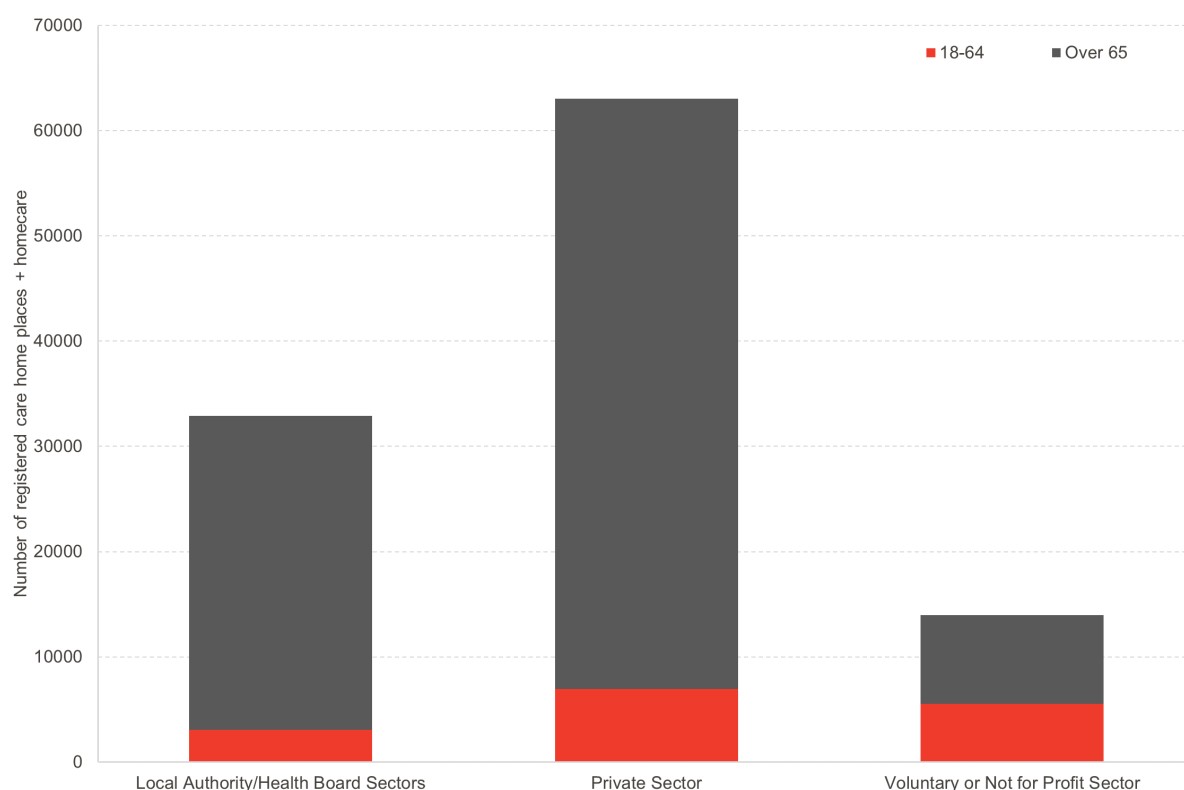
The two largest areas of expenditure are on care homes (£860m in 2020-21) and home care (just under £700m in 2020-21). The remainder of care support is provided through day care services, equipment (for example telecare systems) and support to carers and other community based services carried out by social workers and other social care staff.

Figure 1: Adults supported by social care, by Age Group (2020-2021)



Source: Public Health Scotland

Figure 2: Registered care home places and people supported by homecare by sector – 2021 census week (25th March - 31st March)



Source: Public Health Scotland

Some services are provided directly by the local authority, with other parts commissioned out to private and third-sector providers. As shown in Figure 2, care for those over 65 is most commonly provided by local authorities or the private sector. The third sector provides a larger share of support for working age people.

A range of background information on social care was published by the Scottish Government at the time of the announcement of the National Care Service, and we provide a summary at Annex A.

3 What did the Independent Review on Adult Social Care recommend?

In 2020, the Government commissioned the Independent Review of Adult Social Care (IRASC)^{iv} and tasked them with recommending improvements to adult social care in Scotland. This review is also referred to as the Feeley Review after its lead author Derek Feeley.

The emergence of the idea of a National Care Service can be traced back to the establishment of the IRASC, published in early 2021. However, this was only one part of the findings. There were three interrelated strands to the recommendations:

Structural reorganisation The review recommended a structural reorganisation of statutory responsibilities for the planning, commissioning, and procurement of adult social care with accountability for the social care system transferred to Scottish Ministers.

Service level reforms It also recommended a series of reforms to access and charging for those who draw on care and their carers, based on research with those who draw on and provide social care.

Improvements for the workforce For workers in the sector, a range of improvements were recommended, including improving the pay and conditions and a national organisation for training, development, recruitment, and retention for adult social care support.

Considerations around commissioning run through each strand as a key part of enabling improvements in services, the experience of the workforce, and the financial sustainability of the sector.

There were a number of recommendations that relate specifically to finance that pick-up elements of the strands listed above as well as noting the need to focus on prevention and ensuring demographic change is robustly factored into future investment plans. It notes that there should be “careful consideration to options for raising new revenues to increase investment in adult social care support”.

The IRASC costed a number of proposals related to the second and third strand of service level reforms and improvements for the workforce (it made no estimate of the cost of structural reorganisation).

Table 1 provides a breakdown of the financial implications of a number of the recommendations. Notes to help with interpretation, based on our own analysis, are also in Table 1.

Our own analysis suggests that IRASC total costings are likely to be an underestimate for the reasons noted. The IRASC costings are also not comprehensive of all elements of the social care reform covered in the review. However, the costings were an extremely helpful indication of the scale of investment that the authors thought would be required.

A more detailed overview of these calculations is provided in Annex B.

Some of the costings are now obsolete – for example, the living wage calculations were subsequently estimated on a different basis when they were put into practice. Factoring in inflation, the same costings as produced for the IRASC would now be in the region of £680m in today’s prices.

Table 1: Estimates of the costs associated with the IRASC and FAI notes

Recommendation	£m	FAI Notes
Addressing unmet need	436	Unlikely to be a full reflection of unmet need, but does provide an indication of scale of impact of austerity measures.
Non-residential user charging	51	Does not take account of additional induced demand so likely to be an underestimate.
Free personal and nursing care for self-funders	116	The estimate assumes that the proportion of self-funders that require free nursing care is the same as the average for the whole care home population. Nevertheless, provides a reasonable estimate of possible scale.
Reopening the Independent Living Fund	32	Assumes number entitled to fund remains the same, but amounts increase.
Paying the living wage to frontline workers	15.5	Subsequent announcements on wages for care workers makes these figures obsolete. Based on allocations made in subsequent announcements, the costs the IRASC costs look like a large underestimate.
Paying the living wage to auxiliary workers	4	
Total	654.5	

4 Interim announcements between the IRASC report and the NCS Bill

There have been numerous announcements made since the IRASC concluded. Some of these were based on the recommendations of the IRASC (for example, around pay) and others stem from prior commitments, for example with respect to the Carers (Scotland) Act 2016.

There has also been a significant amount of funding promised for social care reform, both at the 2021 election and subsequently repeated in the May 2022 spending review. Whilst the specific figures have sometimes differed, additional money available at time of writing was £840m, although there is some uncertainty over whether some of that money has already been allocated.

Here we provide a summary of the main announcements and attempt to pull together the additional spending which has been allocated to local government for social care between the IRASC report publication in February 2021 and the National Care Service Bill being laid in parliament in June 2022.

March 2021

In March 2021, around a month after the IRASC report was published, the Scottish Government and COSLA launched a joint statement. Within the statement the Scottish Government pledged action to ensure that adult social care workers would be paid at least the Real Living Wage of £9.50 an hour from May 2021, backdated to April 2021.

Work on developing minimum standards for terms and conditions for workers and for effective voice were also committed to be completed by May 2021 as well as an 'outline of plans in place to deliver':

- an end to charging for non-residential services as soon as possible
- shared ethical commissioning principles
- the overhaul of the current mechanism of eligibility criteria to ensure an approach to social care support that is based on human rights and needs
- a mechanism which ensures the voices of those with lived experience are at the heart of policy development, service design and service delivery
- ensuring that unpaid carers are fully supported to have a life alongside caring, in order to protect their health and wellbeing and better sustain caring roles

There have been no updates on this joint plan as far as we are aware.

Another announcement in March 2021 was a 'statement of intent'^v around health and social care for older people in Scotland with a commitment to publish a strategy. The statement says that this will be developed alongside "the programme of work to implement the Independent Review of Adult Social Care" and work would continue through 2021 followed by a consultation of a draft strategy. Perhaps in place of this, in August 2021, the Scottish Government launched its consultation for a National Care Service.

April 2021

In April 2021, the manifestos for the election were released. The SNP manifesto said:

"we will take forward the recommendations of the independent Feeley review and establish a National Care Service in the next Parliamentary term....

"...the National Care Service will oversee the delivery of care, improve standards, ensure enhanced pay and conditions for workers and provide better support for unpaid carers

"...these changes can only be delivered with increased investment. We will therefore increase public investment in social care by 25% over the parliament, delivering £800m of increased support for social care.

August 2021	In August 2021, the Scottish Government issued a Direction that local authorities must offer a relevant carer of a person who is terminally ill an adult carer support plan within 2 working days. This relates to provisions in the Carers (Scotland) Act 2016 that were to be consulted on and enacted at a later date. No additional resource was mentioned in relation to this Direction.
September 2021	In September 2021, a consultation on Anne's law, which would set in statute the right for named person(s) to visit people in care homes, was launched. The consultation included an intention to introduce the legislation as part of the National Care Service Bill.
October 2021	<p>In October 2021 a Health and Social Care Winter overview^{vi} plus a Winter preparedness plan for adult social care were published ^{vii}. These included commitments and funding to:</p> <ul style="list-style-type: none"> • Strengthen multi-disciplinary working through multi-disciplinary teams. An additional £20m for the remainder for this financial year and on a recurring basis. • Enhance care at home capacity (£62m) • Provide Interim Care placements to ensure everyone get the right care and treatment at the right time, in the right place, and to move people out of hospitals (£40m) <p>In October 2021, Health and Social Care Secretary Humza Yousaf announced plans to increase care workers' pay by around 5% to £10.02.</p>
December 2021	<p>In December 2021, the 2022/23 Budget was announced and included:</p> <ul style="list-style-type: none"> • £174.5 million for continued delivery of the real Living Wage within Health and Social Care • £15 million for uprating of free personal and nursing care payments • £20.4 million for implementation of the Carers Act^{viii} • to provide care additional investment of £124 million at home • £20 million to support Interim Care • an additional £200 million to support investment in health and social care

Table 2 shows our best estimate at the scale of additional amounts of funding that have gone into social care based on published information. It is not straightforward to trace announcements through to amounts appearing in the local government budget line and we may have double counted or omitted some funding.

The Resource Spending Review (RSR) in May 2022 made reference to an additional £840m available for Social Care which relates back to the manifesto commitment. The RSR did not specify where this funding would be directed, and its current status (i.e. whether any of it has already been allocated) is unknown and it has not been included in Table 2.

Table 2: Additional spending on adult social care since the IRASC (relative to original 2021-22 local government allocation)

		Reported additional amounts (£m)		Notes (FAI)
		During 2021-22	2022-23	
Adult social care pay				
March 2021	RLW (£9.50 an hour)	30.5		£30.5m was top up funding (£34 million was in original budget)
October 2021 (Included in Health & Social care: winter overview)	Minimum pay to be increased to £10.02 an hour from December 2021	48		Part year uplift to £10.02
December 2021 Budget for 2022/23	Continued delivery of £10.02		174.5	
	Uplift to £10.50		200	Any residual left after covering the £10.50 available for to cover other pressures
Additional service provisions				
October 2021	Enhancing care at home capacity	62		£62m is a part-year (6 month) costing. £124m is the full year costing for 2022-23.
December 2021 (for 2022/23 Budget)			124	
October 2021	Interim Care placement	40		Non recurring funding announced in 2021/22 with £40m for year 1 (2021/22) and £20m for year 2 (2022/23)
December 2021 (for 2022/23 Budget)			20	
Unspecified				
Total		180.5	364.4	

5 The National Care Service Bill

In August 2021, the consultation on the establishment of a National Care Service was launched. This provided the first indication that as well as adult social care, children's services and social justice social work were in scope.

In February 2022, an [analysis of consultation](#) responses were published. 72% of respondents agreed that Scottish Ministers should be accountable for the delivery of social care. A majority of respondents agreed that there would be benefits to a National Care Service taking responsibility for improvement across community health and care services (e.g., potential for more consistent outcomes across Scotland), although a number of respondents reported risks (e.g., potential for loss of voice and local flexibility). The availability of sufficient funding for the NCS, as envisaged, was also noted by some respondents.

An announcement on the Scottish Government's plans for the NCS was expected in February or March 2022, but the local government pre-election period commenced before an announcement was made. The [National Care Service Bill](#) was subsequently introduced on the 20th June 2022.

The vision for the National Care Service hopes to deliver far reaching reform to the experience of social care in Scotland. However, the NCS Bill does not in itself deliver this, with its main focus on structural reforms to move legal responsibility for social care out of local government and into the Scottish Government.

The rationale for making this a 'framework' Bill without including reforms to front line services is that it will allow time for a co-design process with people who have lived experience of drawing on the care system, and to allow for "flexibility of the service to develop and evolve over time".

The government has committed that any secondary legislation laid in parliament will include 'financial and regulatory assessments. This is welcome. However, secondary legislative procedures involve far less scrutiny than primary legislation. It is unlikely that all reforms will require even secondary legislation, and costs may only become apparent to parliament as part of normal budgetary processes, and may be difficult to identify and scrutinise even then.

In Part 3 of the Bill, there are some changes made for carers, including Rights to Breaks for Carers and Anne's Law which will secure the right to care home visits in the event of future infectious disease outbreaks. It is unclear why these reforms do not require the same co-design process as other planned reforms.

How does the NCS Bill build on the Independent Review of Adult Social Care?

The creation of the NCS was a recommendation of the IRASC.

There are three key areas where the Bill differs significantly from the IRASC recommendations:

- The IRASC's remit only covered Adult Social Care, yet the consultation and subsequently the Bill included provisions for including child social care/social work and criminal justice social work within the NCS. The Bill provisions mean that only adult social care will be included to begin with, but permits expansion to other age groups and services without new primary legislation.
- The Bill also proposes that new Community Health and Social Care Boards are set up to commission services. This goes beyond the IRASC which recommended a redirection of responsibilities for planning, commissioning and procuring services from local authorities to reformed local Integration Joint Boards (IJBs).
- The Bill proposes directly controlled boards, performance managed by civil servants who report to Ministers. The IRASC, by contrast, imagined something more inclusive: a National Care Board, populated by the full range of stakeholders and representatives of people who use services, which would take on the strategic oversight and support of locally empowered boards

As already mentioned, there are also a number of areas that the Bill does not include that the IRASC put forward that relate to changes to service delivery including improvements to services, reforming eligibility criteria and charging regimes and ensuring consistency across the country.

However, commitments to Free Personal Nursing Care rates in line with National Care Home Contract rates and to remove charging for non-residential care are mentioned in the Financial Memorandum, albeit with no updated costing.

What will the NCS Bill deliver and how much will it cost?

A new structure

The costs associated with changing the structure of the NCS (the NCS plus a new care board structure) are considerable but subject to a high degree of uncertainty. The steady-state estimate (from 2026-17) range from £222 million to £500 million. Costs appear to have been modelled on recent structural changes within the Scottish Government, such as those following the devolution of social security which required new capacity within the Scottish Government and the set-up of a new agency.

A significant amount of additional staff costs are envisaged for the setup and running of a department/directorate to oversee Minister's responsibilities in relation to the NCS along with a range of associated costs that will be incurred by both government and Health and Social Care Boards . A large amount of variation comes from the potential additional costs of moving staff from local government to Care Boards due to alignment of pay and conditions.

Although not costed, the Financial Memorandum notes that the phased approach to transfer of responsibilities from local government may lead to a period of double running costs.

The creation of an electronic social care record is in the legislation, but no costing has been produced. The reason given is that it is too early stage to estimate costs.

[A right to breaks from caring](#)

The NCS Bill makes an amendment to the Carers (Scotland) Act 2016, and establishes a right to short breaks for carers who have this as an identified need in an Adult Carer Support Plan (ACSP) or a Young Carer Statement (YCS).

Separately, the Scottish Government will also create a fund to enable support for short breaks without an ACSP or YCS. Costings for this are also provided although as it is not part of the legislation it is out of scope for scrutiny.

The costings depend on a myriad of assumptions, and clearly a lot of thought has gone into developing the estimates. It was not possible to replicate the costings based on the detail initially provided in the Financial Memorandum, but the Scottish Government has been happy to share on request (a full breakdown of assumptions is provided in Annex C). The cost is due to both the replacement care that would be required, as well as the cost of the breaks themselves.

Additional costs, including the short break option, are estimated in the region of £83m to £133m depending on take-up (at most, 55% is assumed). This is net of spending of £149m based on an estimate of the money currently spent by local government on supporting respite for carers¹.

Due to an assumption that take up of ACSP/YCS will be gradual over the next ten years, only a small portion of the full costs are expected in the period covered by the Financial Memorandum.

The right to break for caring could lead to financial benefits flowing back to the Scottish Government if it improves wellbeing of carers and helps sustain their relationships with those they care for, preventing the need for more formal care to be put in place. The financial memorandum does not predict the number of those cases that will be prevented, but notes that the savings could be considerable.

[Anne's Law](#)

There is very little additional cost associated with Anne's Law, other than some costs to the Care Inspectorate for additional resources for producing new guidance, staff training, and resolution of immediate complaints. These are estimated to be £186,000 in 2022/23 and £90,000 in 2023/24. After this point, any additional costs will be minimal and will be absorbed by the sector. These costings were agreed with the Care Inspectorate.

¹ We have been advised that no precise figure can be obtained from local government on support for carers making this estimate particularly uncertain.

A transfer of costs for providing social care

Under the legislation, the current costs of delivering social care will transfer out of local government and into core Scottish Government.

As already discussed, no changes are proposed to frontline delivery for social care within the NCS Bill. However, the financial memorandum does provide an analysis of the expected costs of current provision. Costs are expected to rise in the future due to a range of pressures, including inflation and demographic change.

The Financial Memorandum assumes a 3% real terms increase on all years and services to account for any non-inflationary pressures. This means a real terms increase by 2026-27 of close to £1 billion across social care. No rationale is given for the 3% rise, and it is a little lower than the increase in costs that the LSE/PSSRU² estimated for England over a similar time period in a 2020 paper.

Table 3 compares inflation estimates used in the financial memorandum compared to those published in the Scottish Fiscal Commission's forecast at the time of the spending review in May 2022. It is unclear why the SFC forecast has not been used by the Scottish Government. The SFC figures imply that the Scottish Government may have overestimated inflation in 2023-24 and 2025-26, but underestimated it in 2022-23 and 2026-27. However, the outlook for inflation at the moment is so uncertain that forecasting nominal expenditure is extremely difficult. Using a range of possible estimates may be the best option for financial planning.

Table 3: Inflation estimates

	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27
Financial Memorandum (June 2022)	2.3	2.5	6.2	6.2	2.0	2.0	2.0
Scottish Fiscal Commission Forecasts (June 2022)	0.6	3.9	8.0	2.4	1.7	2.0	3.9

These transferred costs should not be viewed as additional costs as they would occur regardless of the legislation. The difference will be that these costs will now need to be accounted for in the core Scottish Government Budget rather than passed through to local government.

² London School of Economics and Political Sciences/Policy Research Unit in Adult Social Care

6 Conclusions

Any analysis involving social care in Scotland involves a lot of uncertainty. However, given the scale of reforms, transparency is key to building trust and consensus around financial estimates that can stand up to scrutiny and deliver what is promised

Attempts at social care reform are not new in Scotland. However, over the past decade attempts at reform have been set against a backdrop of financial pressures and uncertainty for local government. Whilst financial resources are not the only factor that will affect the success of social care reform, without sufficient resources it will be much harder.

A lot is at stake. Mainly for the people who need to draw on social care, but also for the risks around managing the Scottish Budget. There are many big questions that are yet to be addressed before concerns over the looming potential for yet another gap between vision and reality can be dispelled.

For example, we have very little understanding on unmet need in Scotland. New provision to meet at least some of this need will be required to meet the vision of all people being able to access timely, consistent, and high-quality health and social care support across Scotland. If we cannot quantify how many people will draw on new support it will not be possible to cost and plan.

This type of analysis will hopefully come to the fore over the next year as more of the reform agenda starts to take shape.

There are many potential benefits from getting reform right. Prevention is a worthy, and arguably necessary, aim given the current fiscal outlook and future demographic change. However, there is no doubt that there will be significant upfront costs associated with the NCS vision beyond the amount currently earmarked, especially given the structural reforms that are envisaged. How this money is found, or raised, are additional questions that the Scottish Government will soon need to grapple with.

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- ⁱ Scottish Government webpage on social care: <https://www.gov.scot/policies/social-care/>
- ⁱⁱ NCS Policy Memorandum, available here: <https://www.parliament.scot/-/media/files/legislation/bills/s6-bills/national-care-service-scotland-bill/introduced/policy-memorandum.pdf>
- ⁱⁱⁱ *ibid*
- ^{iv} Independent Review of Adult Social Care report, available here: <https://www.gov.scot/groups/independent-review-of-adult-social-care/>
- ^v Scottish Government statement, available here: <https://www.gov.scot/publications/health-social-care-older-people-statement-intent/documents/>
- ^{vi} Scottish Government statement, available here: <https://www.gov.scot/publications/scottish-government-health-social-care-winter-overview-2021-22/pages/5/>
- ^{vii} *ibid*
- ^{viii} Scottish Government letter to Council's, available here: <https://www.gov.scot/publications/carers-act-funding-letter-to-councils-and-integration-authorities/>

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