

Q1 – What are your views on the latest draft Daily Living activities (activities 1-9)? Are the three new activities – *Communicating, Engaging socially* and *Making financial decisions* – an improvement? Do we need to make any further changes?

- Yes, our view is that these are a valuable addition. No further changes would be required.

Q2 – How well do the proposed weightings and entitlement thresholds in the Daily Living activities (activities 1-9) work to distinguish between differing levels of ability in each activity and to prioritise individuals on the basis of their overall need? Do we need to make any changes to weightings or thresholds?

- Further clarification would be required regarding how many points would warrant an award. Some of the descriptives are a bit unclear e.g. undertaking nutrition – what is meant by a therapeutic source.
- Under Managing Therapy (point b) there should be some indicator as to how much supervision is required.
- Point 3c - 3¹/₂ hours of supervision seems a lot to manage therapy.
- There is a need for further clarification as to what is meant by 'managing therapy'.
- Point 4 – if someone were to need prompting to groom and also needed assistance to bathe would they get the 2 points for assistance to groom and 4 points for assistance to bathe?
- Can someone gain points from more than one descriptor within each section?
- Point 9 – making financial decisions – clarity regarding what complex means and guidance on how this is to be assessed. Real life examples of financial decisions could be included.

Q3 – What are your views on the latest draft Mobility activities (activities 10-11)? Do we need to make any further changes?

- It is positive that people can score points for low levels of mobility

Q4 – How well do the proposed weightings and entitlement thresholds in the Mobility activities (activities 10-11) work to distinguish between differing levels of ability in each activity and to prioritise individuals on the basis of their overall need? Do we need to make any changes to weightings or thresholds?

- The weightings under the Mobility activities need to be reviewed.

Q5 – How well do the draft regulations achieve the intent of the assessment set out in the explanatory note? Do we need to make any changes?

- We feel that the draft regulations achieve the intent reasonably well however some alterations are still required.

Q6 – We have set out in the draft regulations (regulation 4(4)(c)) and the explanatory note (paragraphs 7.13 to 7.15) how the proposed approach to applying descriptors to individuals with fluctuating conditions might work. What are your views on this?

- We feel that it is fair to take account of fluctuation of conditions by consideration of a 12 month period. There is still the query about how to deal with a situation where more than one descriptor within one activity applies to a client e.g. activity 4 needs prompting to groom (1 point) and also needs supervision to bath (2 points) i.e. can these two sets of points be added together?
- Regarding paragraph 7.15 we note that the impact of planned treatment is not to be taken into consideration. It would therefore seem sensible to make time limited awards so that any effects of treatment can be taken into account at a later stage.

Q7 – We set out draft definitions for ‘safely’, ‘timely’, ‘repeatedly’ and ‘in a timely manner’ in paragraph 7.4 of the explanatory note. Do we need to revise these in any way? Should they be incorporated into the draft regulations? If so, how should this be done?

- No, these do not appear to require revision.

Q8 – Do any of the other definitions used within the Interpretation of the draft regulations require refinement?

- We do not believe other requirements are required.

Q9 – Do you have any other comments on the draft regulations?

- No further comments on the draft regulations at this stage.