

CONSULTATION RESPONSE QUESTIONNAIRE

Consultation on Criteria for Reconfiguring Health and Social Care Services



Department of
Health

An Roinn Sláinte

Máinnystrie O Poustie

www.health-ni.gov.uk

CONSULTATION RESPONSE QUESTIONNAIRE

RESPONDING TO THE CONSULTATION

You can respond to the consultation document by e-mail, letter or fax using this questionnaire. The questions in the Questionnaire Response Form may help you in providing your views on the Criteria, but are not intended to limit your comments.

If this document is not in a format that suits your needs, please contact us and we can discuss alternative arrangements.

Before you submit your response, please read Annex A about the effect of the Freedom of Information Act 2000 on the confidentiality of responses to public consultation exercises.

Responses should be sent to:

E-mail: Reconfig.criteria@health-ni.gov.uk

Written: Reconfiguration Criteria Consultation

Department of Health

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Belfast, BT4 3SQ

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The closing date for responses is 20 January 2017

PERSONAL DETAILS

I am responding:	as an individual	<input type="checkbox"/>
	as a health and social care professional	<input type="checkbox"/>
	on behalf of an organisation	<input checked="" type="checkbox"/>

(please tick a box)

Name:	Prof Mark Strachan
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Views are sought on Criterion 1:

Criterion 1

- There is evidence that the outcomes for patients using these services are below acceptable levels either in the services as a whole or in particular hospitals, or where there are safety concerns.

Question 1. Do you agree with Criterion 1 as an appropriate factor to assess the sustainability of health and social care services?

Yes No

If 'no' please feel free to comment below, providing evidence to support any alternative proposal.

If 'yes' please feel free to comment further below.

The College agrees that this is an essential criterion, as no service provider should continue to operate if service provision is below a peer agreed acceptable level, or services are unsafe.

Views are sought on Criterion 2:

Criterion 2

- There is a clear clinical pathway for the patient population. Co-created with patient groups.

Question 2. Do you agree with Criterion 2 as an appropriate factor to assess the sustainability of health and social care services?

Yes No

If 'no' please feel free to comment below, providing evidence to support any alternative proposal.

If 'yes' please feel free to comment further below.

Reform will only work if there is a clear clinical pathway, agreed by the relevant healthcare professionals and in place before change occurs. An example of a previous good experience is the transfer of care from Tyrone County Hospital to Alytnagelvin and Erne, where there was a clearly agreed, documented and protocol driven and established cardiac care model in place to replace the acute cardiology service which was no longer sustainable on the Tyrone County Hospital site.

Views are sought on Criterion 3:

Criterion 3

- The service cannot meet professional standards or minimum volumes of activity needed to maintain expertise.

Question 3. Do you agree with Criterion 3 as an appropriate factor to assess the sustainability of health and social care services?

Yes

No

If 'no' please feel free to comment below, providing evidence to support any alternative proposal.

If 'yes' please feel free to comment further below.

Professional bodies may require certain specified levels of procedures eg coronary intervention, and even when levels are not specified it is generally accepted that clinical outcomes are better in centres seeing more patients with a particular condition.

Views are sought on Criterion 4:

Criterion 4

- The permanent workforce required to safely and sustainably deliver the service is not available/cannot be recruited or retained, or can only be secured with high levels of expensive agency/locum staff.

Question 4. Do you agree with Criterion 4 as an appropriate factor to assess the sustainability of health and social care services?

Yes No

If 'no' please feel free to comment below, providing evidence to support any alternative proposal.

If 'yes' please feel free to comment further below.

A considerable amount is currently spent on agency and locum staff, both consultant and junior grades in order to maintain unsustainable rotas. This applies not only to medical and nursing staff, but other such as clinical physiologists, pharmacists, and other professionals allied to medicine.

Views are sought on Criterion 5:

Criterion 5

- The training of Junior Doctors cannot be provided to acceptable levels.

Question 5. Do you agree with Criterion 5 as an appropriate factor to assess the sustainability of health and social care services?

Yes

No

If 'no' please feel free to comment below, providing evidence to support any alternative proposal

If 'yes' please feel free to comment further below.

Inconsistent and locum medical staffing makes junior doctor training, particularly at SPR level difficult to achieve, and a small number of SPRs (1 or 2) make for unsustainable rotas and inconsistent levels of care. Units undertaking unselected acute take should be staffed by registrars holding MRCP(UK) or equivalent level of staff, in keeping with guidance issued by the three UK Royal Colleges of Physicians. (for example <https://www.rcpe.ac.uk/college/supporting-acute-take-advice-nhs-trusts-and-local-health-boards>)

Views are sought on Criterion 6:

Criterion 6

- There is an effective alternative 'out of hospital' care model or an alternative 'shared care' delivery model.

Question 6. Do you agree with Criterion 6 as an appropriate factor to assess the sustainability of health and social care services?

Yes

No

If 'no' please feel free to comment below, providing evidence to support any alternative proposal

If 'yes' please feel free to comment further below.

Yes, however this model should be proven to be as effective as care provided in hospital settings and appropriately funded and established before transfer of service takes place.

Views are sought on Criterion 7:

Criterion 7

- The delivery of the service is costing significantly more than that of peers or of alternative 'out of hospital' alternatives due to a combination of the above factors.

Question 7. Do you agree with Criterion 7 as an appropriate factor to assess the sustainability of health and social care services?

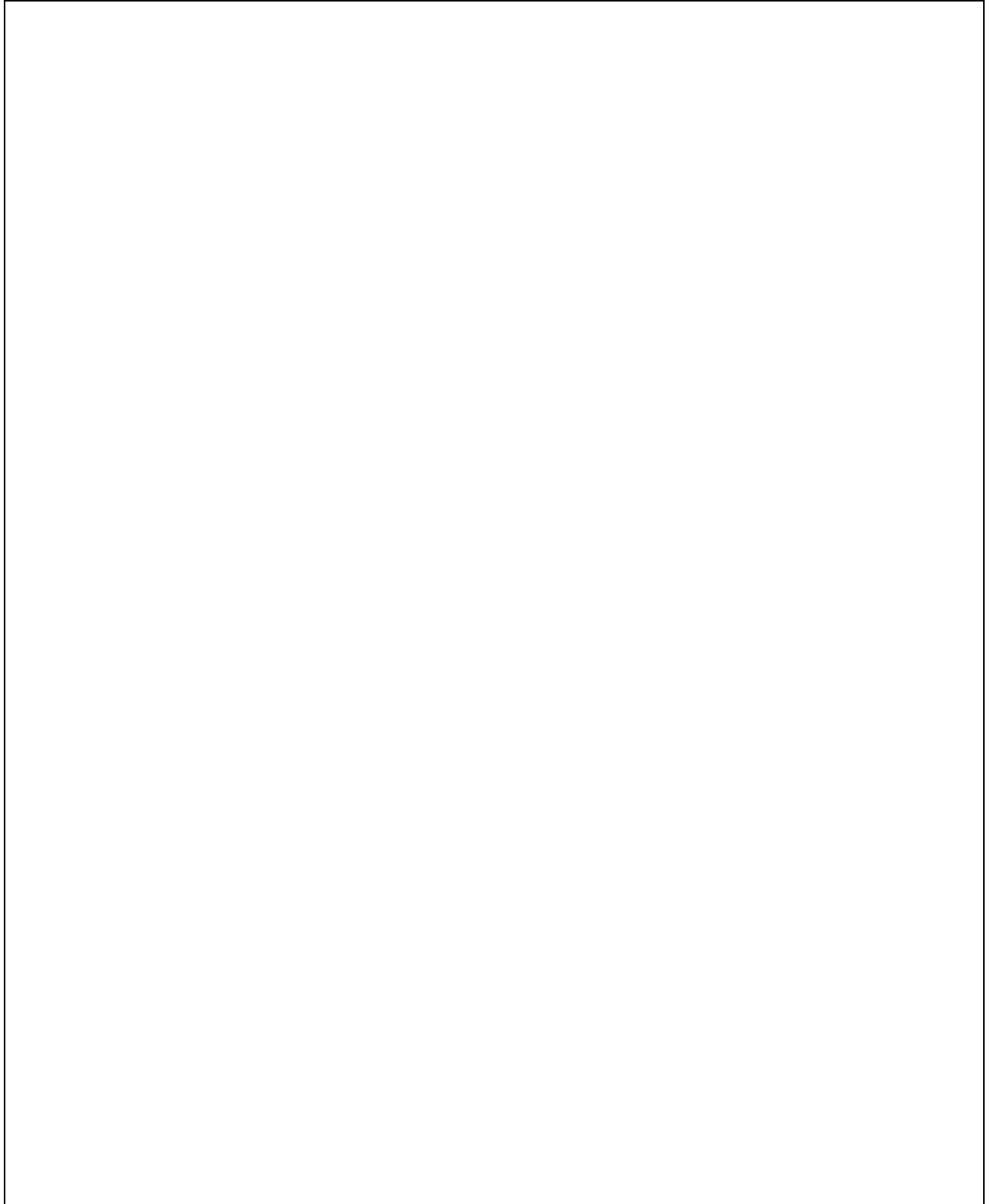
Yes No

If 'no' please feel free to comment below, providing evidence to support any alternative proposal

If 'yes' please feel free to comment further below.

The College agrees with this criterion, with the caveats that costings must take account of particular local circumstances, for example, rurality; level of deprivation and disease prevalence.

Please use the text box below for any additional comments you wish to provide regarding the proposed Criteria as appropriate factors to assess the sustainability of health and social care services.

A large, empty rectangular box with a thin black border, intended for providing additional comments. It occupies the majority of the page's vertical space below the instruction text.

EQUALITY OF OPPORTUNITY QUESTIONS

The Department aims to advance equality of opportunity for a range of groups in respect of the proposed criteria for assessing the reconfiguration of Health and Social Care services. Under Section 75 of the NI Act 1998; nine groups of people are identified and consideration of their different needs is important. These groups are:

1. Age (older and younger people);
2. Gender (including transgender and men and women generally);
3. Marital Status (including Civil Partnership);
4. Religion;
5. Ethnicity;
6. Political Opinion;
7. Dependant Status;
8. Disability; and
9. Sexual Orientation.

Question 8. Based on belonging to any of the Section 75 groups, do you have any particular requirements with regard to the proposals?

Yes No

Comments:

Question 9. Generally, do you think there are any particular requirements for any of the Section 75 groups? If so, what would you consider as a potential solution?

Yes

No

Comments:

The Department will publish a summary of responses following completion of the consultation process. Your response, and all other responses to the consultation, may be disclosed on request. The Department can only refuse to disclose information in exceptional circumstances.

Before you submit your response, please read the paragraphs below on the confidentiality of consultations and they will give you guidance on the legal position about any information given by you in response to this consultation.

The Freedom of Information Act gives the public a right of access to any information held by a public authority, namely, the Department in this case. This right of access to information includes information provided in response to a consultation. The Department cannot automatically consider as confidential information supplied to it in response to a consultation. However, it does have the responsibility to decide whether any information provided by you in response to this consultation, including information about your identity should be made public or be treated as confidential.

This means that information provided by you in response to the consultation is unlikely to be treated as confidential, except in very particular circumstances. The Lord Chancellor's Code of Practice on the Freedom of Information Act provides that:

- The Department should only accept information from third parties in confidence if it is necessary to obtain that information in connection with the exercise of any of the Department's functions and it would not otherwise be provided;
- The Department should not agree to hold information received from third parties "in confidence" which is not confidential in nature;
- Acceptance by the Department of confidentiality provisions must be for good reasons, capable of being justified to the Information Commissioner.

For further information about confidentiality of responses please contact the Information Commissioner's Office (or see their website at: www.ico.org.uk)