



Department of  
**Health, Social Services  
and Public Safety**

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AN ROINN

**Sláinte, Seirbhísí Sóisialta  
agus Sábháilteachta Poiblí**

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MÁNNYSTRIE O

**Poustie, Resydènter Heisin  
an Fowk Siccar**

# **PROPOSALS FOR HEALTH & SOCIAL CARE REFORM**

**Consultation Response Questionnaire**

## CONSULTATION RESPONSE QUESTIONNAIRE

You can respond to the consultation document by e-mail, letter or fax.

Before you submit your response, please read **Appendix 1**, at the end of this questionnaire, regarding the Freedom of Information Act 2000 and the confidentiality of responses to public consultation exercises.

Responses should be sent to:

E-mail: [hscreforms@dhsspsni.gov.uk](mailto:hscreforms@dhsspsni.gov.uk)

Written: Modernisation Directorate  
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### RESPONSES CANNOT BE CONSIDERED AFTER MONDAY 12 MAY 2008

I am responding: as an individual  on behalf of an organisation

(please tick a box)

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**Q1. The Department is seeking your views on the functions, constitution and governance proposals for the new Regional Health and Social Care Board.**

Response:

NEA NI welcomes the core functions of the Regional Health and Social Care Board (RHSCB).

Having worked through the Investing for Health model in the Eastern Board Area and at a locality level (in Northwest, South and East Belfast) delivering outcomes for people in fuel poverty, we have some comments about the RHSCB's ability within the indicated framework to be able to adequately performance manage and commission as Health Improvement.

We would advocate that Health Improvement expertise be clearly linked and contracted to commissioning and the performance management function of the RHSCB. Furthermore, that link needs to be reinforced by representation on committees of LCG's to ensure connection with Health Improvement to the voluntary and community sectors.

We believe that commissioning and governance functions for health should be central to the RHSCB and directed through LCG's to ensure that the health improvement is central to the wider health and social care agenda.

NEA NI via community of interest in North & West Belfast and responding to local needs in North Belfast were enabled via the Investing for Health (IfH) model to design plan and deliver a programme of work in Inner North Belfast to tack fuel poverty. This 3 year project known as Northern Exposure, has raised the issue of fuel poverty and drawn in funding of £1/2 million in funding alongside support from EST and Belfast City Council. This work has real outcomes for people in an era where cheap energy prices are no more. This work is meeting real local need, creating affordable warmth and healthier lives in this area.

NEA NI wish to highlight the outcomes of this work, the need to protect the systems and processes where they are working and at the minimum, ensure that a mechanism exists to reflect same.

**Q2. The Department is seeking your views on the functions, constitution and governance proposals for the Local Commissioning Groups, including membership.**

Response:

In terms of the LCG's, we welcome the fact that local knowledge is held up and would like to see that reflected via partnerships with users, carers and the wider communities. In relation to the local and regional commissioning between two competing priorities we would raise the issue of who has the final say on commissioning.

We welcome co-terminosity of the LCG's with Trusts and Council but have concerns around the distance from local communities and therefore ability to reflect the real issues on the ground..

In terms of membership we pose the questions:

1. Why has lay person reduced 2 to 1 and are non-elected local representative's replacements to lay representative.
2. Process of appointment.

In relation to the RHSCB's under responsibility we would pose questions

1. Where is Statutory Duty of Engagement.

**Q3. The Department is seeking your views on the process for obtaining local government representation on the Boards of the Local Commissioning Groups.**

Response:

Representation should reflect the principles of equality.

**Q4. The Department is seeking your views on the functions, staffing and governance proposals for DHSSPS.**

Response:

- How will the DHSSPS work with the new Regional Public Health Agency?
- Will there be a separation between government aspects of health improvement and aspects that will be dealt with by RHPA?
- The DHSPPS will be responsible for policies such as Investing for Health ~ how will this fit in with the RHPA?

**Q5. The Department is seeking your views on the additional functions, staffing and governance proposals for the common services organisation.**

Response:

We believe that there is a need for the CSO, however, we have concerns that the savings reported are been double accounted under Trust RPA initiatives.

**Q6. The Department is seeking your views on the proposal to create a Regional Public Health Agency and the functions it would undertake.**

Response:

34% of all Households in Northern Ireland are suffering from fuel poverty (2006 House Condition Survey) and this figure is rising so we welcome the statement 'Improved health & wellbeing and reduced health inequalities are the yardsticks by which the success of that system will be measured.' We believe the statement indicates that the intention is to tackle the underlying causes of poor health via a social model (which is long overdue).

We have a number of questions to pose.

- Will the RPHA have tackling health inequalities as a key function?
- Will the RPHA work within the overarching framework of Investing for Health?
- Will there be implications of taking health improvement and health inequalities work out of the commissioning and provision organisations i.e. LCGs and Trusts.

**Q7. The Department is seeking your views on the proposal to incorporate Health and Social Care Trust specialist health improvement functions into the Regional Public Health Agency.**

Response:

We have concerns that this may weaken the Trust's ability to provide outreach and become involved in local initiatives, and therefore would await further clarification.

**Q8. The Department is seeking your views on the proposal that, in the future, local government could be required, through legislation, to consult with the Regional Public Health Agency when developing its community plans.**

Response:  
NEA NI support this proposal.

**Q9. The Department is seeking your views on the proposal that the Regional Health & Social Care Board and its Local Commissioning Groups would be required, through legislation, to seek advice from the Regional Public Health Agency when developing their commissioning plans.**

Response:  
NEA NI have an issue that a contracted commitment to seek advice from RHSCB is not as effective as mainstreaming community development, health improvement and health inequalities. An obligation on advice is not the same as duty to work on health inequalities. This issue needs to be clarified.  
The role of community / Voluntary Sector is fundamental to supporting and delivering work to tackle inequalities and as such needs recognition and attention in this section.

**Q10. The Department is seeking your views on the proposal to appoint the Chief Executive or a senior Executive of the Regional Public Health Agency as a non-Executive of the Board of the Regional Health and Social Care Board.**

Response:  
No comment.

**Q11. The Department is seeking your views on the proposal of how to make the work of the Regional Public Health Agency fully multi-professional.**

Response:  
No comment.

**Q12. The Department is seeking your views on the proposals for the Agencies referred to in Section 8.**

Response:  
No comment.

**Q13. The Department is seeking your views on the proposals for the two options, set out in Section 9, to replace the HSS Councils.**

Response:  
NEA NI favours Option 1 as a single, focal voice on the issue.  
NEA NI believes that this to be crucial in advocating on and behalf of patients and clients. We would like to ensure that the council engage meaningfully with clients, carers, communities. The role of councils should be fearless and independent and to be so requires legislation to act and establish itself as a body to be reckoned with.

**Q14. The Department is seeking your views on the constitution of the new organisation(s) under each of the proposed options, set out in Section 9, to replace the HSS Councils.**

Response:  
No comment.

## Human Rights

**Q15. The Department is seeking your views on the human rights implications of the proposals for Health and Social Care reform and any issues you think relevant.**

Response:

NEA NI has the following concerns:

- The language is not community friendly.
- The proposals are internally focused on staff rather than on community.
- Mental Health services need to be addressed and implementation of the Bamford Review initiated.

Suggested Actions

- EQIA should be run again and focus on Section 75 groups.
- Rural/urban issues should be examined.
- A socio/economic impact assessment should be examined since this is fundamental to health and wellbeing.
- Support should be identified, ensuring that communities will be listened to.

## Equality

**Q16. Can you identify any additional relevance evidence or information which the Department should have considered in assessing the equality impacts of these proposals?**

Response:

Incorporated in Q15.

**Q17. Can you identify any other potential adverse impacts, with supporting evidence, which might occur as a result of these proposals being implemented?**

Response:

See Q15.

**Q18. Can you suggest any other mitigating measures to eliminate or minimise any potential adverse impact on the staff concerned?**

Response:

See Q15.

**Q19. Have the needs of the Section 75 categories of people been fully considered in this EQIA? If not, please provide details and supporting evidence.**

Response:

See Q15.

**Q20. Do the proposals afford an opportunity to promote equality of opportunity and/or good relations?**

Response:

See Q15.

## **General Comments**

Response:

**THANK YOU FOR TAKING THE TIME TO RESPOND TO THIS CONSULTATION**

## FREEDOM OF INFORMATION ACT 2000 – CONFIDENTIALITY OF CONSULTATIONS

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; and
- 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 web site at:

<http://www.informationcommissioner.gov.uk/>).