

Your reference

Our reference

Date

26 January 2017



City of
Stoke-on-Trent

The Rt. Hon. Jeremy Hunt MP
Secretary of State for Health
Department of Health,
Richmond House, 79 Whitehall,
London,
SW1A 2NS

Dear Secretary of State,

**Consultation on the 'My Care My Way: Home First' proposals
Referral to Secretary of State**

At a special meeting of the Adults and Neighbourhoods Overview and Scrutiny Committee held on 30 November 2016, the committee recommended to City Council that:

“After being consulted by a relevant NHS body on a proposed substantial development or variation to the provision of health service within Stoke-on-Trent, the Adults and Neighbourhoods Overview and Scrutiny Committee recommends to City Council that it:

- 1. refers the My Care, My Way: Home First proposal (“the proposal”) as a new model of care provision within Stoke-on-Trent to the Secretary of State for Health for the following reasons:**
 - i) it is not satisfied that the consultation conducted on the proposal has been adequate in relation to the content. The consultation lacked any information about the closure of community beds which forms part of the new model of care or the impact such closures will have on the health service in Stoke-on-Trent;**
 - ii) it is not satisfied that that the reasons given for the lack of consultation on the closure of community beds i.e. a directive from NHS England not to consult, is adequate.**
 - iii) the closure of the community beds would not be in the best interests of the health service, given that capacity within the community is not there, there is a lack of GPs in the area, the instability of the domiciliary care market in the area is of concern and there is a significant backlog of people already waiting for adaptations to their homes.”**

Consequently at the meeting of City Council on 26 January 2017, the following recommendation was approved:

“That, pursuant to Regulation 23(9) of the Local Authority (Public Health, Health and Wellbeing Boards and Health Scrutiny) Regulations 2013, the City Council refers the ‘My Care My Way: Home First’ consultation proposals on the new model of care to the Secretary of State for Health.”

This referral follows the Adults and Neighbourhoods Overview and Scrutiny Committee’s initial response to the consultation and is made pursuant to Regulation 23(9) of the Local Authority (Public Health, Health and Wellbeing Boards and Health Scrutiny) Regulations 2013 for the following reasons:

The authority is not satisfied that consultation has been adequate in relation to time or content (Regulation 23(9)(a)): -

The Council is not satisfied that the consultation conducted on the proposal has been adequate in relation to the content. The consultation lacked any information about the closure of community beds which forms part of the new model of care or the impact such closures would have on the health service in Stoke-on-Trent.

At a meeting on 9 July 2015 the committee were informed of the proposals for a new model of care known as ‘Step Up Step Down’. At this meeting the committee were told that the ‘step up’ services would be provided by Leek and Haywood community hospitals and ‘step down’ services would be provided Bradwell and Cheadle community hospitals and that a consequence of the new model of care was that 291 intermediate care beds would be required in the community from October 2015 onwards, which was approximately 35-40 fewer than at present. The beds no longer required were the 37 beds at Longton Cottage hospital proposed for closure as part of the new model of care, which were part of the consultation proposals.

At a meeting of the committee held on 9 September 2016, the committee were informed that the “Step Up and Step Down” New Model of Care consultation had been renamed ‘My Care My Way: Home First’. The consultation proposal at this stage remained on the new model of care and closure of 37 beds at Longton Cottage Hospital, with the remaining community hospitals still playing an important part of the New Model of Care.

The committee were also advised at that meeting that the consultation would be phased in four stages:

- Phase 1: 14 September to 14 December 2015 – Consultation on the permanent closure of the 37 beds at Longton Cottage Hospital;
- Phase 2 October 2015: December 2015 – Public Consultation. Representatives from the CCGs to attend events to outline the proposals and seek views;
- Phase 3: December 2015 – January 2016 – Review of responses by the CCGs
- Phase 4: January 2016 – March 2016 – Publish the outcomes from the consultation around the 37 beds within Longton Cottage Hospital.

However, at a meeting on 14 October 2015, the committee were advised by the CCG that NHS England had decreed on 12 October 2015 that the CCGs could no longer consult on the closure of 37 beds at Longton Cottage hospital, and only on the proposed 'My Care My Way: Home First' New Model of Care.

Given that the premise of the consultation had changed completely, and that the committee had met on two occasions on 9 July 2015 and 9 September 2015 to consider the consultation based on the original proposal to close 37 beds at Longton Cottage Hospital, the committee felt that the whole process had been confusing and that they had been misled. The content of the consultation at no point included a proposal or reference to the closure of community beds at Cheadle, Bradwell and Haywood hospitals. However, despite the above timeline, beds were closed during the consultation process at Haywood Hospital, Cheadle Hospital and Bradwell Hospital. Cheadle Hospital has since closed completely and Bradwell Hospital was also closed but has since been forced to reopen to accommodate patients as a consequence of an outbreak of Norovirus at the Royal Stoke Hospital.

In addition, the committee also raised concerns at their 14 October 2015 meeting that despite formal consultation commencing a month earlier on 14 September 2015, there were still no questions available for the committee, patients, local residents or patient groups to respond to a month later.

Given these facts, the City Council is not satisfied that the time given to consult and the content of the consultation were adequate.

The Authority is not satisfied that the reasons given by the Clinical Commissioning Group for not consulting on the closure of community beds is adequate (Regulation 23(9)(b)):-

The Council is not satisfied that that the reason given for the lack of consultation on the closure of community beds, which was based on a directive from NHS England not to consult, is adequate.

The Authority considers that the proposal would not be in the best interests of the health service in the area of North Staffordshire and Stoke-on-Trent (Regulation 23(9)(c)):-

The closure of the community beds would not be in the best interests of the health service, given that capacity within the local community is not there. Areas of concern are the stability of the domiciliary care service, which is currently struggling with recruitment and retention of staff; the lack of GPs and associated recruitment difficulties in the area; the backlog of people waiting for disabled adaptations, given that as at September 2016, there were 584 people waiting for an assessment for a disabled adaptation in Stoke-on-Trent, which has a significant impact on the number of delayed discharges from an acute setting to home and finally, the impact that closure of the community beds will have on carers and families in the area.

The committee, recognised that significant investment has been made by the CCG into health services in North Staffordshire and Stoke-on-Trent in advance of the implementation of the New Model of Care, however they were not convinced that capacity in the community was present at the current time to enable the closure of so many community beds safely in such a short period of time and despite the

recruitment drive, the committee considered that there is still a lack of provision in the community causing concern when patients are sent home.

A representative of Healthwatch has been present at the committee meetings where the New Model of Care has been discussed and their concerns have been taken into consideration as part of this referral as have the views expressed by members of the Health and Wellbeing Overview and Scrutiny Committee at Newcastle-under-Lyme Borough Council. The views of NHS England were also sought, when Brigid Stacey from the North Midlands Regional Office attended the committee meeting on 30 November 2016.

I look forward to your response.

Yours sincerely

Councillor Dave Conway
Leader of Stoke-on-Trent City Council.