

Please contact: Jon Pitt (01634 332715)

Your ref:

Our ref: JP/HASC

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Sent electronically

Dear Stuart,

Proposed Reconfiguration of GP Surgeries in Gillingham

Thank you for attending the meeting of Medway's Health and Adult Social Care Overview and Scrutiny Committee on 21 August 2018 for discussion of the above item.

Key concerns raised at the Committee by Committee Members, ward Councillors and members of the public included the following:

- Engagement with patients who would be affected by the changes had been inadequate, with the deadline given for responses not having allowed sufficient time for response. It was also considered that there should have been more opportunity for people to attend public meetings and concerns were raised that the letter from the CCG to patients who would be affected by the proposals did not clearly set out the proposals or how responses would be taken into account as part of the decision making process.
- That the closure of two GP surgeries would be likely to increase appointment waiting times and have an impact on the quality of care provided.
- In view of Gillingham North ward being amongst the most deprived wards in Medway and having higher than average health needs, it was considered particularly important for local residents to have access to local primary care.
- Gillingham North has relatively low car ownership and public transport in the area was considered to be poor. It was therefore considered to be unreasonable for residents, many of whom had long term health conditions, to be expected to travel further in order to see a GP.
- The closure of the GP Surgery at the Sunlight Centre would put other services at the centre and in the local area at risk and the lack of these services would be detrimental to the development of social prescribing.
- That GP practices were being proposed for closure before there were clear plans and timescales in place for the development and delivery of primary care hubs in Medway.

- The strength of local feeling was evidenced by a petition against the proposals that had collected around 1,000 signatures.
- That the level of detail provided in the report to Committee was insufficient to enable the Committee to reach an informed view about the likely impact of the proposals on patients.
- That the concerns raised by the public and ward councillors, as set out above, need to be fully taken into account by the Primary Care Commissioning Committee on 29 August as the basis on which the Committee has decided the proposals constitute a substantial variation / change to the health service in Medway.

Under Regulation 23 of the Local Authority (Public Health, Health and Wellbeing Boards and Health Scrutiny) Regulations 2013, NHS bodies and health service providers are required to consult a local authority about any proposal which they have "under consideration" for a substantial development of or variation in the provision of health services in the local authority's area.

Although the terms, "substantial development" and "substantial variation" are not defined in the legislation, the Committee considered that it should have been obvious that a proposal that would result in the closure of two GP surgeries would be an issue about which it should be consulted. This lack of engagement with the Committee was considered to be particularly disappointing given that in a letter previously sent to the CCG (dated 4 July 2018) on behalf of the Committee, the CCG was reminded of the statutory obligation to consult with the Committee when proposals for substantial health service changes or variations are initially under consideration.

The Committee is extremely concerned and disappointed about the lack of consultation with Overview and Scrutiny on this issue, which had only been included on the Committee agenda due to it having been requested as a Member Item, in accordance with the Council's constitution. On this occasion, there is a period of only four working days between the CCG consulting the Committee and the date on which it plans to take a decision on this matter.

Decision made by the Committee

The Medway Health and Adult Social Care Overview and Scrutiny Committee has determined that the proposal to merge four Alternative Providers of Medical Services (AMPS) contracts into one contract and to reduce operating sites from five to three constitutes a substantial variation of provision.

The Committee has also formally recommended that the CCG takes into account the concerns and key issues raised at its meeting on 21 August, that the CCG should delay the decision due to be made by the Primary Care Commissioning Committee on 29 August 2018 and that it should commence an extended consultation period. This should take proper account of the alternatives and issues presented by stakeholders during the new consultation period.

As you are aware, the Committee is able to refer a proposed substantial development or variation to the Secretary of state in certain circumstances. However, the Committee hopes that it can reach an agreement with the CCG about the way forward and would welcome being presented with full details of the

proposal, including a more robust rationale for the proposed changes and information on the further public engagement / consultation that it is asking the CCG to undertake.

Please can you ensure that this letter is presented to the CCG Primary Care Commissioning Committee meeting on 29 August and advise me at the earliest opportunity of the CCG response.

Yours sincerely



Jon Pitt
Democratic Services Officer