

14 February 2023

Via email to:

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Dear Alex

Thank you for your letter dated 3 February 2023 outlining a number of concerns regarding the *General practice services in Norwich* consultation on proposed plans for services when the Norwich Walk-in-Centre (WiC) contract expires in Spring 2024.

I am sorry that you have found the need to send us a formal letter on this matter. I have responded to each of your concerns below, which I hope addresses the issues you raised.

If you would like any further information, please do reach out to Mark Burgis, Executive Director of Patients and Communities, or indeed Paul Hemingway, Associate Director of Communications and Engagement; they would both be happy to discuss anything with you further.

### **Concerns with how the consultation is being conducted**

**Your concern:** *The length of the consultation being nine weeks.*

**Our response:** Prior to the launch of the consultation, we conducted two programmes of engagement. The first was in June 2022 to identify opportunities for service improvements and challenges at the WiC. The second was an additional period of targeted engagement with advocates of vulnerable adults and adults with additional needs, conducted in November 2022. This specifically gained vital input from underrepresented communities.

The law does not stipulate how long a consultation must run for but instead requires that adequate time is given for consideration and response. During development of the consultation materials, we sought legal advice on the consultation. Advice received indicated that for a consultation of this scale, a nine-week consultation window is sufficient for the options outlined in this consultation. We are aware of and work to the national guidance laid out by NHS England for all our consultations. The guidance does not mandate that the ICB run a consultation for 12 weeks. The length of this consultation is proportionate to the issue we are consulting on.

**Your concern:** *At no point has any member of the team consulted with HWN regarding early involvement with diverse communities, local Healthwatch organisations, patient groups and other local organisations nor have the HWN been consulted in regard to engaging NHSEI.*

**Our response:** Healthwatch Norfolk were invited to tender for the pre-engagement work that included accessing diverse communities, along with other potential providers, prior to consultation in 2022. As a result of this exercise, Healthwatch Norfolk were unsuccessful. The work was awarded to Engaging People in June 2022. This included a public survey to understand the use of the WiC and identify opportunities for service improvements and challenges.

Engaging People were contracted in November 2022 to provide further pre-engagement work to seek qualitative feedback from vulnerable adults and adults with additional needs who use the WiC. This included a series of 1:1 interviews. The findings of both reports were used to inform the options developed.

While the supplementary pre-engagement work was being undertaken, NHS Norfolk and Waveney ICB teams were also engaging with some of the Norwich practices and the Primary Care Network to understand their patients' usage of the WiC, along with any concerns they may have about service developments.

Healthwatch Norfolk along with other key stakeholders received a pre-launch briefing in confidence under embargo ahead of the launch of the consultation. Like other stakeholders, Healthwatch Norfolk is free to respond to the public consultation now underway and any feedback it provides will be considered by the ICB.

As part of the consultation and engagement work planned, we will be engaging with the Norfolk and Waveney ICS Health Inclusion Group and charity organisations that support vulnerable adults, to ensure their needs and views are captured as part of the process.

**Your concern:** *There has been a disregard for strong public and patient engagement and consistency with current and prospective need for patient choice.*

**Our response:** The ICB has undertaken significant pre-consultation engagement and has now commenced a comprehensive nine-week consultation to involve the public in decisions about how primary care should be delivered in Norwich. Patient and professional engagement was sought early, and we were clear from the start that pre-engagement and using information we had available was vital to inform the consultation itself.

Plans to go out to consultation on GP services in the area were originally postponed in 2022 as there was insufficient time to do this effectively. Following this decision, the WiC contract was extended for an additional year, to allow additional qualitative work to be undertaken so that views from vulnerable groups could be gathered and given ample consideration.

**Your concern:** *The requirement that an easy read version of the consultation papers is provided has not been met.*

**Our response:** An Easy Read version was shared with a Learning Disability Peer Support Worker and Green Light Champion for their review and feedback on the document.

The first Easy Read document was uploaded to the website on 3 February 2023, with an updated version uploaded on 7 February 2023. Details of the changes made were added to the website when the document was updated. The updates incorporated feedback received from the support worker and ensure the language of the Easy Read version is as closely aligned to the consultation document as possible.

The initial Easy Read document received 57 downloads between 3 and 7 February 2023.

**Your concern:** *The requirement that provision must be made for language translations and Braille has not been met.*

**Our response:** As with all consultations, the consultation documents are always available in alternative formats upon request. In the interest of using resources wisely, this is the same approach for all alternative format requests.

A full Equality Impact Assessment has also been published on our website which considers the impact of the proposals on our people and communities.

Information on how to request these documents is available on the front cover of the consultation document, as well as the summary. This includes telephone, email, and post contact details.

We have taken account of the feedback you provided about the translation function of our website not being clear. We have added those instructions to the consultation landing page.

Information on how to request alternative formats of the documents was also added to the consultation landing page on 3 February 2023, to make it even clearer without having to read the consultation documents.

So far, we have received one request for a copy of the document in Braille, which is in the process of being fulfilled. The person requesting the copy has had regular communication with the NHS Norfolk and Waveney ICB communications and engagement team on the progress of their request.

**Your concern:** *The only non-digital documentation comes with an expectation that users will need to visit the WiC to obtain a copy, demonstrating a lack of understanding or accommodation of varieties of users.*

**Our response:** Paper copies are available at the WiC and GP Practice at Rouen Road. Printed copies are also available on request using the contact details provided on the webpage. The landing page was updated on 3 February 2023 to state that people can request printed copies to be printed and mailed to them to make this even clearer. A telephone number and email address are provided for this.

In addition to the online survey, 1:1 interviews with advocates of at-risk and vulnerable adults are being undertaken during the consultation period as part of the engagement activity. This activity will be captured in a separate qualitative report.

Additional 1:1 conversations and engagement with healthcare professionals in the Norwich area will also be undertaken during the consultation period.

We have also worked with local media outlets, patient participation groups, and stakeholders to proactively spread the word about the consultation, with a clear view that people can take part both on and off-line.

### **Concerns with the consultation documents**

**Your concern:** *There is no reference to any economic evaluation of cost savings to A&E departments across Norfolk.*

**Our response:** It is important to be clear that the WiC is a primary care service, not a Minor Injuries Unit or Urgent Care Centre. On reviewing activity undertaken at the WiC, the majority is primary care activity, which is explained in the description of the current WiC services in the consultation document. There should therefore be negligible difference to the activity in Emergency Departments with a change to the WiC.

There is already a commissioned GP out of hours service available when GP practices are closed, which provides an alternative service.

**Your concern:** *There is no reference to the value of patients from outside of Norwich using the service.*

**Our response:** The summary data provided within the consultation document outlined the majority (66%) of patients using the WIC are from Norwich based practices.

This consultation with the public and the resulting development of any proposals will provide local practices with a significant period of time to consider how any changes would integrate with existing service provision. We will then of course engage with our people and communities to share what these proposed changes look like for feedback, before any implementation commences.

**Your concern:** *Spreading equivalent funding across Norwich GP practices can never provide the same level of care or quality of services provision.*

**Our response:** For option three, current capacity would be retained and redesigned in conjunction with local practices as well as the wider primary care network, to best address health inequalities and ensure that our populations continue to have access to health and care support at a greater number of locations, as opposed to just the WiC. The consultation document does not suggest that the funding would be spread across Norwich practices.

**Your concern:** *The idea that the WiC is not giving continuing care is not credible as it is never likely to see the same GP even at your own practice.*

**Our response:** The reference to continuity of care was made with regard to the motivation for the nationally led Fuller Stocktake Report. It is not referenced in the advantages or disadvantages of any of the options.

**Your concern:** *Transient people will be further disadvantaged.*

**Our response:** The aim of option three would be to provide flexibility of services to support communities with underserved health needs. This would include those who live more dynamic lives.

As part of the consultation and engagement work planned, we will be engaging with the Norfolk and Waveney ICS Health Inclusion Group and charity organisations that support vulnerable adults, to ensure their needs and views are captured as part of the process.

**Your concern:** *Previous CCG (Norwich) tried extending GP contract hours into evenings and weekends, but it had very limited take up*

**Our response:** All primary care networks in Norfolk and Waveney now provide enhanced access between 6.30-8pm Monday to Friday and on Saturdays.

These appointments are available for patients to use. This came into effect nationally in October 2022 as part of the [Enhanced Access approach](#).

**Your concern:** *It is a very biased survey without any information about what the third option alternative might be 'in a different way' (page 11)*

**Our response:** The consultation is an opportunity for public and wider stakeholder input to shape what services look like.

The consultation document states clearly within option three as follows: “We have not finalised details of how this would operate in practice because feedback from patients, the public, and healthcare professionals is essential at this early stage to shape how services could be delivered to best meet local needs.”

The consultation document also goes on to say “Public feedback from the consultation is essential in helping to shape what this looks like. Redesigning the WiC capacity would provide flexibility to adapt services and enable practices working together in Norwich PCN to manage current and future demand for healthcare.”

This consultation is a listening exercise for individuals to feed in their views on how healthcare services are provided, and provides text boxes for feedback on all the options, including a request for additional ideas or things that the ICB may not have considered. All the feedback received will be carefully reviewed at the outcome of this consultation.

**Your concern:** *Page 2 refers to extensive engagement work and conversations with local people and clinicians. Is the return rate of 160 people a credible statistical reach?*

**Our response:** The public pre-engagement survey gathered a certain number of responses; it was live for three weeks in June 2022. Engagement materials and support materials were shared with clinicians.

In November 2022, additional targeted 1:1 engagement with advocacy groups was also undertaken which was presented in a report to the NHS Norfolk and Waveney ICB.

This included qualitative interviews with representatives from New Routes Integration, Deaf Connexions, Vision Norfolk, YMCA, Magdalene Group, Health Inclusion Group representative (Tracy Williams), and the People from Abroad Team, Norfolk County Council.

The outcome of both reports, plus the targeted engagement with Norwich practices as outlined above, were all utilised in the options development.

**Your concern:** *A report analysing data from earlier involvement activity was not published*

**Our response:** The reports from both the initial engagement activities were presented to the working group in NHS Norfolk and Waveney ICB and were used to inform the development of the three options which can be found in the consultation.

Summary findings of the first round of engagement were shared with the NHS Norfolk and Waveney ICB Executive Management Team in July 2022, with notification of the plan to undertake additional targeted engagement with advocacy groups to further inform the potential consultation procurement process.

Due to business sensitivity, summary findings of the November pre-engagement activity and recommendations for options to proceed with the consultation were presented in private in December 2022 to the Primary Care Commissioning Committee, as well as NHS Norfolk and Waveney ICB EMT. A briefing was shared with the Norfolk Health Overview and Scrutiny Committee and a Chairman's meeting of HOSC was also conducted in December 2022.

**Your concern:** *Page 5 refers to users of the VAS being transferred to a GP surgery after 6 months. Can this be evidenced?*

**Our response:** The VAS delivery model consists of three elements; an inclusion health hub, inclusion health practices and a (non-Syrian) asylum seeker and refugee service. The patients supported are often homeless, living in temporary accommodation, hostels or their accommodation is at risk.

The Inclusion Health Hub is for individuals experiencing acute chaos, extreme complexity, and multiple comorbidities. It is intended that individuals will spend a short time (ideally less than six months) being supported by the Inclusion Health Hub, and then integrated into primary care within the Norwich Primary Care Network (PCN) to one of the Inclusion Health Practices to ensure a supported transition and to plan for ongoing needs when clinically fit to do so.

More information about this service and summary of the successful transition of a number of patients from the Inclusion Health Hub into identified Inclusion Health practices was presented to the Health Overview and Scrutiny Committee [on 2 September 2021](#).

**Your concern:** *Page 11, second bullet point refers to a duplication of service. No detail is provided as to why this is a problem if both services are being fully utilised.*

**Our response:** We want to ensure that we are using local taxpayer's money in the most efficient way possible, and duplication of services is not efficient. There is statutory guidance nationally on improving outcomes for those with unmet health needs. With this consultation we are considering options to remove this duplication of service to create capacity to flexibly provide GP services in a way that will help reduce health inequalities across the Norwich area.

**Your concern:** *Incorrect references are made to the WiC only being used by Norwich residents. A heat map demonstrates that the centre is used all over the County.*

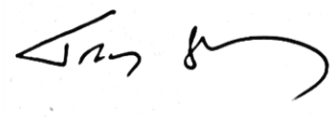
**Our response:** As detailed within the consultation document, the majority of patients (66%) who access the WiC are registered at another Norwich PCN practice. No reference to the WiC "only being used by Norwich residents" is stated in the consultation document.

I hope this letter has addressed your concerns and provides reassurance that the consultation is being carried out in line with national guidance. We welcome further feedback and input from Healthwatch Norfolk as part of this consultation process.

The feedback as a result of this consultation will be considered holistically. No decisions have been made and we are committed to making sure that the voice of local people is heard, loud and clear.

I also wanted to thank you for raising these concerns with us and look forward to continue working with you as we continue to help people lead longer, healthier and happier lives.

With best wishes

A handwritten signature in black ink, appearing to read 'Tracey Bleakley', with a large, sweeping flourish at the end.

Tracey Bleakley  
**Chief Executive Officer**  
NHS Norfolk and Waveney Integrated Care Board