

Questions from the public attending Norfolk and Waveney ICB Primary Care Commissioning Committee on 13 February 2024

Item 07 - Holt Medical Practice application to close Blakeney branch surgery

(Please note only the questions are recorded here alongside the answers. All the comments given alongside the questions can be heard verbatim in the recording of the meeting <https://www.youtube.com/watch?v=Zrqi8ILO7lg&feature=youtu.be> starting at 9 minutes and 10 seconds)

Tim Ambler by email:

I have an uncomfortable feeling that the main reason why HMP seeks to deny Blakeney patients the same service as Melton Constable's is that the HMP partners would trouser considerable sums of money by selling Blakeney surgery?

Answer – HMP has set out the rationale for its application in its submission to the ICB.

At the Committee meeting itself:

Tim Ambler - Blakeney Resident

There has been no proper consultation between the practice and the patients ever on this subject.

Answer – Healthwatch Norfolk has stated they ‘consider that HMP have discharged their duty to engage and consult with the constituent patient group that could potentially be affected by the closure of the Blakeney Surgery. Healthwatch have had sight of HMP’s report on its engagement exercise and can confirm that it is a fair reflection of the process, content and themes that were followed by HMP and communicated by respondents.’

The ICB director of primary care was personally copied into many letters to the practice during their engagement period as well as receiving letters directly, and has also had sight of the many items of correspondence, survey results and petitions.

HMP has set out the rationale for its application in its submission to the ICB.

The Committee approved a recommendation for the ICB to undertake public involvement to hear further feedback on the practice’s proposal to mitigate the closure by establishing a medicines collection service at an alternative local site.

Alexandra Hooper - Chair of Stiffkey Parish Council

I would like the ICB to explain how the case for closure of Blakeney surgery effectively considers the location specific inequalities in access and outcome the closure will create.

As well as the environmental impact of the need for increased travel and the way in

which this will appropriately dovetail to NHS Net Zero aims compliance with climate legislation and the increased carbon footprint, the increased journeys would result in.

The ICB give assurances that any further consultation and work before a final decision does use location specific data as its basis rather than a broader use of North Norfolk, which is not necessarily an accurate reflection of the situation.

Answer – the ICB will consider the application from HMP by reviewing how it can continue to meet the reasonable needs of all its registered patients, noting the practice’s registered patients live across a rural and wide geographical area. The ICB will consider the data available to it in doing so, alongside its duties, which include consideration of S.14Z44 – duty to have regard to the need to comply with climate legislation (consideration will be given to the guidance from NHS England), S.14Z35 – duty to reduce inequalities in access and outcomes and S.149 - Equality Act – public sector equality duty.

Nigel Sutcliffe – Vice Chair of Blakeney Parish Council

If this group do not act on the wishes of patients as demonstrated in the report before you today, then who does look after the interests of the minority of patients within Holt Medical Practice overall patient base to ensure they receive access to NHS services locally as identified in national guidance.

Answer – the temporary decision to stop face to face appointments in Blakeney was supported by the ICB as commissioner and is set out in the report.

When considering an application for branch surgery closure, the ICB must consider a number of factors as set out in clauses 8.15.13 and 8.15.14 of the NHS England Policy Guidance Manual (these are also referenced in the report to the committee):

- *financial viability;*
- *registered list size and patient demographics;*
- *condition, accessibility and compliance to required standards of the premises;*
- *accessibility of the main surgery premises including transport implications;*
- *the Commissioner’s strategic plans for the area;*
- *other primary health care provision within the locality (including other providers and their current list provision, accessibility, dispensaries and rural issues);*
- *dispensing implications (if a dispensing practice);*
- *whether the contractor is currently in receipt of premises costs for the relevant premises;*
- *other payment amendments;*
- *possible co-location of services;*
- *rurality issues;*
- *patient feedback;*
- *any impact on groups protected by the Equality Act 2010 (for further detail see chapter 4 (General duties of NHS England));*
- *the impact on health and health inequalities; and*

- *any other relevant duties under Part 2 of the NHS Act (for further detail see chapter 4 (General duties of NHS England)).*

The committee has approved a recommendation to defer the decision in order to undertake further public involvement to understand patient views on the practice proposal to provide a residual medication collection service in Blakeney to inform the decision.

Rosemary Thew - Chair of Blakeney Parish Council

The report is disingenuous in parts, for example, saying that the surgery reduced before the pandemic in response to patient demand and a question, could you explain please how patient demand was assessed?

The report shows the average age, of North Norfolk to be 50.1 years, but is the practice aware that lately has a much higher population of people over 65 than Norfolk generally? How has that been factored in and what account has been taken of the fact that about 1/3rd of the population of Blakeney may live alone, suggesting limited support network for transport to a remote surgery?

Will the practice please explain how patients are expected to get to Holt or even worse, to Melton Constable given the length of the journey by public transport, and that despite trying to recruit, there is still a shortage of voluntary drivers in Blakeney?

Answer – *the practice included in their submission how patient demand had been assessed (this can be found on pages 4 and 5).*

The ICB will consider the application from HMP by reviewing how it can continue to meet the reasonable needs of its registered patients, noting the practice's registered patients live across a rural and wide geographical area. The ICB will consider the data available to it in doing so, alongside its duties.

Dr Cllr Victoria Holliday - NNDC Cllr for Coastal Ward

A significant change in service provision were removed from Blakeney before COVID. We are told that this was with the support of the Commissioner, given that we had previously been informed that governance processes were not followed at that time. Is it possible to see the evidence of the Commissioner support for this change in service provision?

Agenda item 9 today is an advice note for branch surgeries seeking to change their service provision or opening hours. I understand the lengthy consultation process with patients and stakeholders both by the practice and the ICB is then required. This consultation did not happen at the time hours and service were reduced at Blakeney surgery. Why isn't the current advice to branch surgeries being followed and a full consultation on the withdrawal of clinical services from Blakeney surgery rather than just on medication provision now being carried out?

Answer – *The ICB has received correspondence on this from the Blakeney Parish Council Clerk and is responding to it directly. To clarify, the temporary decision to cease face-to-face appointments was taken with the support of the commissioner.*

The committee approved the current advice note at its meeting on 13 February 2024. It was therefore not in place at the time of the previous changes, and so it would not be appropriate to retrospectively apply the advice note before it had been approved. The committee agreed an effective date of 13 February 2024.

Duncan Baker - MP for North Norfolk

Is this the right decision to close vital medical services in a very, very elderly and rural community? And I think you all know the answer to that and therefore put the right mitigation in place if you're going to end up with a decision, I think I know that you're going to have.

Answer – *Holt Medical Practice has set out its workforce and business viability challenges in its application.*

The application included appendices detailing the patient engagement information, including the Survey Report from the Office of Duncan Baker.

The ICB will consider the application from HMP by reviewing how it can continue to provide general medical services to meet the reasonable needs of all its registered patients, noting the practice's registered patients live across a rural and wide geographical area. The ICB will consider the data available to it in doing so, alongside its duties.

The committee approved a recommendation to defer the decision in order to undertake further public involvement to understand patient views on the practice proposal to provide a residual medication collection service in Blakeney, to inform the decision.