

Mr Ned Sharratt
Assistant Clerk
Public Petitions Committee, Room T3.40
Scottish Parliament
Edinburgh
EH99 1SP

13 August 2015

Dear Mr Sharratt

**CONSIDERATION OF PETITION PE1568
(Funding, access and promotion of the NHS Centre for Integrative Care)**

Thank you for your letter of 10 June 2015 concerning petition PE1568 (Funding, access and promotion of the NHS Centre for Integrative Care). It may be helpful if I first provide the Public Petitions Committee with some background information in relation to the Scottish Health Council's role. NHS Boards are required to involve people when they are considering changes to health and care services. The national guidance, 'Informing, Engaging and Consulting People in Developing Health and Community Care Services'¹, outlines the process NHS Boards should follow to involve people in decisions about local services.

The Scottish Health Council works with NHS Boards and communities across Scotland, to improve patient and public involvement in service change. When the Scottish Government considers a proposal to be a 'major service change', the Scottish Health Council has a quality assurance role and reports on whether the process has been in line with the guidance. For those changes that are not deemed to be 'major' the Scottish Health Council provides advice to support the NHS Board in developing consistent, proportionate and robust engagement in line with guidance.

The guidance details a process by which NHS Boards should inform and involve local people in the development of options for making changes to services, ensuring that the views of potentially affected people and communities are listened to and taken account of in decision making. This is relevant to all change proposals, regardless of whether they are deemed to be major.

The Scottish Health Council can offer a view on whether or not service change proposals might be regarded as 'major', but any decision as to whether or not it is considered to be a major service change rests with the Scottish Government. NHS Boards must seek advice from the Scottish Government on whether a proposal for service change may be considered major. For those that are, a three month period of formal consultation will be required, and if the NHS Board chooses to proceed with proposals, Ministerial approval will be required. Prior to seeking the Scottish Government's advice on whether the proposed service change is major, NHS Boards should use the Scottish Health Council's "Guidance on Identifying Major Health Service Changes"² to help inform their own considerations.

¹ 'Informing, Engaging and Consulting People in Developing Health and Community Care Services', Scottish Government, 2010, www.sehd.scot.nhs.uk/mels/CEL2010_04.pdf

In order to inform our view on whether a change is major, we request a wide range of information from the relevant NHS Board in relation to the change proposal and the impact any proposals would have on patients and carers. This includes information in relation to: any public or political concern; changes in accessibility; conflict with national policy and consequences for other services. If we feel the information provided is insufficient in any of these areas to allow us to form a view then we will request additional information.

The information we receive from NHS Boards is in addition to our own knowledge of the views of local people on the proposal, informed by input from our local staff.

In August 2014, we were asked by NHS Lanarkshire for our view on whether or not the review of homeopathy services and referrals to the centre for Integrative care should be regarded as 'major'. NHS Lanarkshire shared with us their own assessment that the change should not be regarded as major, together with supplementary information including a Board paper and consultation report.

The information provided to us on NHS Lanarkshire's consultation to cease GP referrals to the Centre for Integrative Care confirmed that:

- existing users of the Centre for Integrative Care would continue to access services until they are discharged
- existing patients would not be discharged prematurely from their care plan; however, if referrals were ceased they would not be re-referred to the service at a future date

The information did not include the figures for appointments. However, this had been raised in our previous discussions with NHS Lanarkshire. It was discussed in December 2013, prior to the consultation, as we sought to clarify the number of people using the service and who would therefore be impacted by any proposed change. NHS Lanarkshire provided information on activity levels, including existing patients from the previous year's activity (2012/2013). This included approximately 1300 return appointments.

Upon receiving clarification that people receiving treatment prior to any decision would continue to do so, we felt that the greatest impact would be to those who may require a new referral, if a decision to cease new referrals was made by NHS Lanarkshire's Board. The figures provided indicated that this totalled 270 new referrals (individual patients) for 2012/2013.

We were also advised by NHS Lanarkshire that following any such decision to cease referrals, new patients, such as those with chronic conditions could still continue to access services proven to be clinically effective via mainstream care e.g. acupuncture, pain management, psychology and counselling.


On this basis, and taking account of similar changes which were not deemed to be major service change, we provided our view that in this case the proposed change would not constitute major service change. This information was provided to NHS Lanarkshire in the 5th November 2014 letter referenced in your letter. Our letter also acknowledged that the majority of views expressed via a survey conducted by NHS Lanarkshire supported the provision of the service; outlined the need to demonstrate how those views have influenced any decision; and set out further actions we considered to be necessary.

² <http://www.scottishhealthcouncil.org/publications/guidance.aspx>

As the Scottish Government decided that the proposal was not a major service change, the Scottish Health Council has not had a quality assurance role.

We have included in the accompanying email NHS Lanarkshire's letter which responds to the points raised in our letter dated 5th November 2014. I hope you find this information helpful in responding to the request.

Yours sincerely



Richard Norris
Director
Scottish Health Council

www.scottishhealthcouncil.org

The Scottish Health Council is part of Healthcare Improvement Scotland