

## Future arrangements for NHS commissioning across the Black Country and West Birmingham

Healthwatch Birmingham welcomes the opportunity to respond to the consultation on *Future arrangements for NHS commissioning across the Black Country and West Birmingham*. Our key role is to make sure that patients, the public, service users, and carers (PPSuC) are at the heart of service improvement in health and social care. In line with our role, we have focused our comments on:

- Patient and Public Involvement.
- Whether the proposals are responsive to the needs of those accessing services, ensuring that they do not lead to health inequality.
- The potential impact of proposed changes on the ability of the CCG to engage with communities.
- The extent to which proposed plans address the needs of West Birmingham citizens.

Healthwatch Birmingham welcomes the intention to implement structures to help tackle common issues across the area, particularly health inequities. We believe that the proposed merger of the four CCGs has the potential to improve joint commissioning, maximise the benefits of partnership working across the Integrated Care System and ensure a single commissioning vision and voice. However, as a local Healthwatch that represents the interests of West Birmingham Citizens, we have often raised with the health and social care system the difficulties that the positioning of West Birmingham presents to governance, planning and day-to-day tasks. The NHS Procedures<sup>1</sup> for CCGs application for a merger asks merging CCGs to demonstrate that there is a good working relationship with the relevant local authorities, in circumstances where coterminosity is an issue. We acknowledge the different ways that the new merged CCG intends to work with Birmingham structures (e.g. the Health and Wellbeing Board).

In the course of our work across Birmingham, it has been our observation that the separation of West Birmingham from the rest of Birmingham has caused issues for most partners who cover the whole of the Birmingham footprint. This is also a challenge for Both STP footprints. We have observed at the Black Country STP meetings and updates that West Birmingham is often forgotten when describing localities and often slipped in when challenged as an afterthought. This is the same at City Wide partnerships such as the Birmingham Health and Well Being Board and Birmingham's Older Peoples Partnership Board that is focused more on the Birmingham and Solihull STP Footprint. We continue to hold the concern that the needs of the West Birmingham population is not being considered as fully as it should be. We therefore hope that there will be real meaningful collaboration, integration and a real inclusion of West Birmingham ensuring that the needs of all communities presented under the new CCG are met.

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<sup>1</sup> See - <https://www.england.nhs.uk/wp-content/uploads/2016/11/guidance-constitution-mergers-dissolution-nov16.pdf>



## Patient and Public Involvement

Healthwatch Birmingham would like to commend the CCG for offering different ways for the public to express their views on the proposed merger. We note that virtual engagement events have been held for each area, and that responses can be made via a feedback form, and by email. In particular we welcome that there is the opportunity to request the conversation document in other formats.

However, Healthwatch Birmingham is concerned about the timing of the engagement. Held as the NHS enters stage 3 of recovery from the novel coronavirus pandemic, there are clearly competing pressures on stakeholder's time, and the public's focus. Some areas within the CCG's engagement has been on enhanced surveillance due to coronavirus outbreaks. It is our concern that the active clinical engagement required as part of this merger will prove difficult. We would like to read in the consultation response how you have ensured that members of each CCG have been actively engaged throughout the process.

West Birmingham is not a widely defined area. Many residents may not self-identify as being in West Birmingham. Healthwatch Birmingham will be interested to see in the consultation report how well represented the area is by responses. We would also like to see that responses reflect the diverse demographics of residents. We therefore look forward to reading in the consultation response, how well you have engaged with hard to reach groups - those with a language barrier, those from deprived areas and those that would not be able to attend meetings, nor access documents on line. We would like to read in your consultation report the range of people that you were able to reach through the engagement methods adopted for this consultation.

If engagement has been low in particular groups, we would like to see a specific plan on how the CCG will engage with these residents in the future

We note that this consultation is in regards to commissioning arrangements only. We look forward to the CCG ensuring there is sufficient consultation about any significant service changes following merger. This should include an equality/impact assessment clearly identifying individuals or groups that will be affected by any changes to services, and how they will be prioritised for engagement to inform any service change.



## Engaging with local communities

NHS Procedures<sup>2</sup> for CCGs application for a merger asks the merging CCGs to demonstrate that a move to a larger geographical footprint will not compromise the new CCGs ability to engage with local communities. We are aware of some joint working initiatives already taking place across the four CCGs that reflect the needs of the local population. However, we would like to urge the CCGs that following the merger, considerable attention is paid to local grassroots engagement and relationships. The single CCG should develop a strategy for involving patients, the public and service users in decision-making. Such a strategy will clearly outline how and why patients, the public and carers will be engaged. This will ensure that there is commitment across the CCG to using patient and public insight, experience and involvement. It will also make clear arrangements for collating feedback and experience. Therefore, we suggest that service user, the public and carer's insight and experience be collected to not only identify barriers to improved health outcomes but also to identify and understand health inequality.

Healthwatch Birmingham has been working in partnership with various CCGs across Birmingham to ensure that they meet their legislative duty to involve patients and the public in the commissioning of services. Equally, that they meet their duty to listen to seldom heard groups. A Quality Standard has been developed by Healthwatch Birmingham and NHS England West Midlands. It provides the basic approach to using patient and public insight, experience and involvement to identify, and understand and address barriers to service improvement and address health inequality. We believe that developing an engagement strategy using the Healthwatch Birmingham Quality Standard would ensure that engagement does not suffer. The Quality Standard consists of a series of objectives covering the process of: Identifying, understanding and addressing health inequality and barriers to improve health outcomes. It also covers such issues as: learning from working with patients and the public; communicating with patients and the public; evaluating the impact of decisions; and developing organisational culture.

We look forward to working with the Single Commissioning Group on the Quality Standard, following the merger. More information on the Quality Standard can be found [here](#).

## Proposed Merger

Healthwatch Birmingham welcomes the place approach taken by the CCG to ensure services best meet the needs of local populations. We note that four places are contiguous with local authority areas, however the place of West Birmingham does not cover a whole local authority of Birmingham. This will require a much higher level of partnership working

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<sup>2</sup> See - <https://www.england.nhs.uk/wp-content/uploads/2016/11/guidance-constitution-mergers-dissolution-nov16.pdf>



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to ensure that on a service delivery level, services are parable across Birmingham. Relationships with the Birmingham and Solihull CCG and Birmingham City Council will be absolutely key. We are pleased to see the commitment to be fully involved in local Health and Wellbeing boards.

Healthwatch Birmingham are aware that some legacy commissioning arrangements have existed in the current CCG, leading services to be inequitable. We would welcome clarity on the timeframe to audit commissioning arrangements to ensure access to services is fair and equitable.

Yours Sincerely,



Andy Cave

Chief Executive Officer



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