

**Joan Stewart, KONP, Address to Health Overview and Scrutiny Committee, 21 November 2019**

## **HOSC should call for a formal consultation on the proposed merger of Clinical Commissioning Groups**

- We would urge HOSC to open up these proposals to detailed scrutiny, and to seriously consider calling for a formal public consultation. These proposals are about more than 'streamlining' a commissioning structure. A CCG with centralised control would make key decisions on planning and contentious funding allocations that could introduce yet more rationing and further limit access to local services. And a single remote CCG would be even more difficult to hold to account.
- The engagement report is short on crucial detail. Where are the risk, impact and equality assessments, the evaluation of workforce challenges and financial plans? The Nuffield Trust has already flagged six major risks for Primary Care Networks, the main building blocks of the ICS.
- The survey designed for key stakeholders – not the public or local authority -presupposes agreement with the proposal, but it's not inevitable that the three BOB CCGs have to merge. Elsewhere in the country GPs have halted a merger application, when they examined the potential negative impact on their patients.
- We have previously argued for a formal public consultation on this merger but that legal argument was rejected by NHS England. However, a response from them to a local MP says that there are grounds if a merger results in a change to commissioned services, due to 'a harmonisation of commissioning policies' or a 'reconfiguration of services'.
- Clearly this report proposes changes to commissioned services when it refers to merging the commissioning function, and supporting the redesigning of services. Substantial changes that would justify triggering a formal public consultation, according to NHS England.
- Given all this, it is imperative that HOSC conducts a full analysis to determine the impact on local services, the restrictions on accountability and local democracy, and on where scrutiny would fit in a super-CCG.
- Finally, we would also urge HOSC to consider the merits of a formal public consultation that would require the BOB ICS to make the case for yet another top-down reorganisation of healthcare in Oxfordshire.