

A National Framework for NHS Continuing Healthcare and NHS-funded Nursing Care in England

Response to Consultation



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Executive summary

A National Framework for NHS funded long-term care

The Government is determined to establish a simpler, more consistent, system of assessment to determine eligibility for full NHS funding of long-term care. The main goal of the proposed National Framework for NHS Continuing Healthcare and NHS-funded Nursing Care in England **that comes into force with effect from 1 October 2007** is a common set of rules for Continuing Healthcare that will

- help staff to arrive at decisions consistently and transparently, and
- make sure that people can get the help they need on the same basis, wherever they are in England.

The Framework covers both fully-funded NHS Continuing Healthcare (where the NHS is responsible for the whole care package in any care setting) and NHS-funded Nursing Care (where the NHS is responsible for the nursing required from a registered nurse in a care home setting).

The Framework proposes a standard process for assessing eligibility for these services, including tools to support decision-making. The Framework is based on existing best practice across England. It does not change the underlying legal framework on which current eligibility policies are based.

The Consultation

The key elements of the National Framework were published in a Consultation document, and public responses were obtained over a period of three months. The questions posed within the Consultation document aimed to gather opinion about several fundamental issues including:

- the idea of a National Framework to cover NHS Continuing Healthcare and NHS-funded Nursing Care, including tools to support decision-making.
- whether care needs, rather than diagnosis or any other factor, ultimately determine a requirement for NHS Continuing Healthcare.
- what facts and circumstances are taken into account when assessing entitlement to Continuing Healthcare.
- the idea of a single rate of payment for NHS-funded Nursing Care.

Many people commented about other aspects of the proposed Framework.

This report

This report is a summary of the written responses to the consultation, and sets out our response. It also describes some of the work we have been doing since the consultation to help us answer your questions. At the end of the report, the timetable for the implementation of the National Framework is discussed.

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Part 1: Introduction

Background

The White Paper, *Our Health, Our Care, Our Say: A New Direction for Community Services*, sets out the Government's commitment to a National Framework for care for people who require long-term care outside an acute hospital. We call this **NHS Continuing Healthcare** in the case of fully-funded patients, and **NHS funded Nursing Care** where only the costs of registered nursing services are met.

The purpose of the Framework is to improve the clarity and consistency of care provision, so that examples of the policy working differently in different areas will stop.

The proposals for the new Framework were written following consultation with representatives from health and social care and voluntary organisations as well as users and carers and were set out in a Consultation document. The consultation was conducted by the Department of Health ('the Department') between 19 June and 22 September 2006. The consultation questions are listed in **Annex 1**.

NHS Continuing Healthcare is usually thought to be for older people, often in residential care, but it also applies to younger people and can be provided in any setting. Therefore, although the Framework reinforces the Government's policy commitments to dignity in care and healthy ageing as set out in *A New Ambition for Old Age*, it is separate from the *National Service Framework for Older People*. This guidance does not cover under 18s (children). Whilst similar principles and values apply to Continuing Care for Children, the law and case law are different in this area. For example, children also have a need for education. Guidance on this topic is currently under consideration.

Overview of the consultation process

We wanted to make the consultation open to everyone. As well as the main consultation paper, three other documents were published at the same time. They were

- the *Core Values and Principles of the Framework*
- a *Public Information Leaflet*, and
- a *Presentation* setting out the main content of the Framework (for use by groups).

We published *A Partial Regulatory Impact Assessment* at the same time. This set out our estimate of the costs and benefits of the National Framework.

All of these are available from the Continuing Care Policy pages on the Department's website at

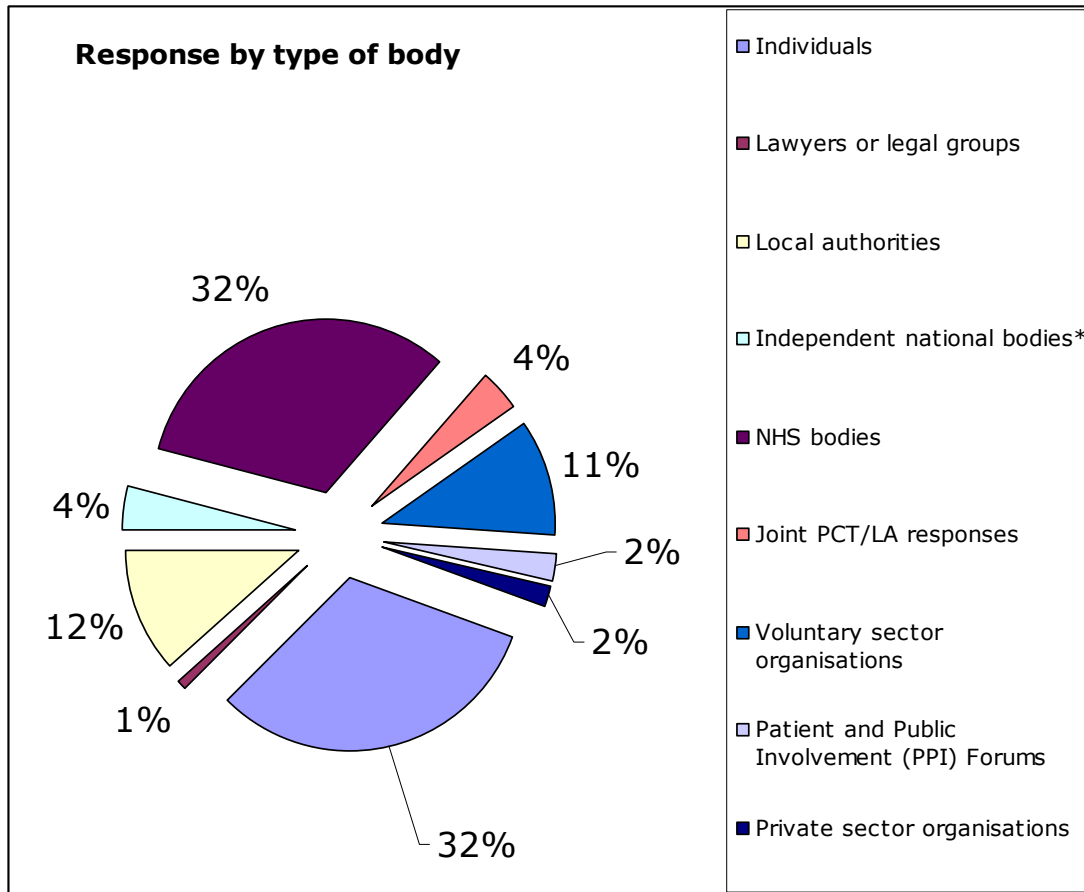
www.dh.gov.uk/en/Consultations/Closedconsultations/DH_4139205

We held public meetings in Birmingham, Bristol, Leeds and London which about 640 people attended and we had meetings with key interest groups.

Annex 2 lists the individuals and organisations that sent us a written contribution, and **Annex 3** is a list of the meetings.

Type of respondent

The following chart shows that NHS organisations and – most pleasing – individual members of the public were the leading contributors.



* Such as the Royal College of Nursing, or the Royal College of Physicians.

Acknowledgements

Many of those who wrote or attended one of the public meetings (and some did both) responded to each of the questions, but some covered only those points of particular concern to the contributor, or on points where they had particular expertise or personal experience.

We would like to thank them all for taking the time and trouble to help us.

Progress since the consultation

We redrafted the tools to support decision-making that were put forward as part of the consultation, according to comments from respondents. There is more information about this in the next section. We published the new versions online on 29 January 2007, and 17 Primary Care Trusts (PCTs) across the Country took part in a trial to test whether they were helpful and easy to use. They have tested the tools on over 1,200 cases. We also ran workshops in every

Strategic Health Authority region for the people who are going to be using the Framework to decide on people's eligibility.

We are publishing the revised Framework at the same time as this response. This is so people can see exactly how we have responded to the issues they raised in the consultation.

Scope of this report

This is a summary of the written responses to the consultation with our response. Although every response has been carefully read and analysed, this report will deal mainly with comments made by at least 5 percent of respondents. Not everyone replied to all questions, so we analysed each question separately, with the figures in the main text referring to percentages of people who replied to that question, rather than to the total number of respondents. Where responses highlighted points that applied to more than one question, this is described in terms of the total number of respondents.

Finally, we set out the timescale for the implementation of the Framework.

Part 2: Responses to the consultation questions

Terminology

(Question 1)

What you told us

- In terms of names used for different types of funding, respondents frequently suggested they would be satisfied with more than one alternative.
- 31 percent of respondents to this question believed the names given in the title of the consultation document should or could be kept.
- Many respondents suggested that NHS-funded Nursing Care should be altered to indicate that the nursing care is not fully funded.
- Some respondents found the phrase ‘primary health need’ unclear, and suggested it be renamed (one alternative being ‘predominant health need’).
- Many respondents noted that any further changes in terminology might lead to more confusion, and that the key issue is explaining terms to the public, rather than the names themselves.

Our response

- To minimise further change, we will keep the same names used in the consultation document (NHS Continuing Healthcare and NHS-funded Nursing Care).
- Likewise, changing the phrase ‘primary health need’ at this stage would cause much confusion and be incompatible with court rulings and previous guidance.
- However, we acknowledge that these terms and phrases could be better defined. For this purpose the new Framework documents will include a glossary of terms.

The proposed National Framework: roles and responsibilities

(Question 2 and other comments)

What you told us

- A narrow majority (49 percent against 34 percent) did not approve of the proposal to remove the responsibility of the Strategic Health Authority (SHA) for continuing care policy. The major concerns were that local interpretation could lead to inconsistency or a lack of accountability, and that PCTs might have conflict of interests.
- 16 percent of respondents to question 2 said that the ability of PCTs to respond to local demands could be helpful, because they have direct links to the commissioning of care services.
- A third of all respondents told us that auditing and monitoring the process at every stage is important, and many also said that we should have an appeal and dispute resolution route monitored or carried out by independent bodies.

- 16 percent of respondents thought that NHS and Local Authorities (LAs) could take joint responsibility; 15 percent of all respondents raised this possibility with respect to various stages of the process (questions 2,3,7,8 and 10).
- 28 percent said that it was unclear who (clinicians, multi-disciplinary team etc) should be carrying out assessments.

Our response

- Because most people told us **not** to move to PCT responsibility, we have reviewed this proposal. Ultimately, the National Framework is for PCTs to apply, and SHAs will no longer set 'local' eligibility criteria. Instead, the SHA will be responsible for managing PCT performance in operating the National Framework. Guidance about the role of SHAs in performance management and dispute resolution is included in the Framework.
- We agree with the many respondents who said there should be an opportunity for LAs and PCTs to work together and the Framework reflects this.
- We hope that we have clearly set out roles and responsibilities, including the different responsibilities of PCTs and SHAs regarding assessments and dispute resolution in the new Framework.

The proposed National Framework: process and implementation

(Question 7 and additional comments)

What you told us

- Most responses (59 percent) were positive about the illustrated process; 30 percent were neutral or ambiguous in their responses.
- 28 percent of respondents emphasised the importance of **training** (and accreditation of assessors; and, in response to questions 4,5 and 7, said that it would be crucial to proper implementation.
- 31 percent said that the links to current systems, such as the single assessment process (SAP), should be made clearer (this was mentioned by 17 percent of all respondents to questions 6,7 and 8).
- 33 percent of respondents told us that we had to make clearer how the process applies to individuals not in care homes (such as people in respite care, rehabilitation, intermediate care).
- 15 percent of respondents felt there needed to be more emphasis on advocacy and carer involvement; the need for attention to be paid to carer needs and wishes was also raised in response to Questions 6 and 10.
- Many respondents noted the need to have clear and realistic **timescales** for every stage of the process.
- 26 percent felt that **resource and capacity implications** should be better assessed and asked whether additional funding would be made available; in response to various questions, the issue of financial implications was raised by a total of 24 percent of all respondents

Our response

- We welcome the positive reaction to the proposed Framework and believe that we have used the contributions we received to improve it.
- The connection between the National Framework and existing or emerging assessment procedures (e.g. SAP and CAF), and other care options, is clearer in the Framework. The proposed National Framework process and documentation is not intended to replace existing assessments, nor does it introduce an additional layer of assessments.
- In addition to the workshops we held for PCTs and LAs earlier this year, we are developing a national training package to ensure that the NHS and LAs are well aware of the changes which are taking place.
- We are publishing a full Regulatory Impact Assessment to discuss the costs and benefits in more detail.

Basis for eligibility decisions

Question 3, 6, 8 and 9

What you told us

- 74 percent of people who responded to question 3 agreed that the proposed framework achieves its goal to assess individuals on their need for care, and that this is the right thing to do.
- However, 21 percent of respondents said that diagnosis should also be taken into account, because it can be the key trigger for determining needs and can help in establishing the prognosis for a patient.
- 88 percent of respondents were in favour of a national **Screening Tool** (as it was called during the consultation). The need to recognise the impact on discharge from hospital was raised.
- Some people said that automatically giving greater emphasis to end-of life care was inconsistent with a needs-based approach. Many respondents said that the guidelines on end-of-life decisions would have to be particularly clear in the tool. The need for clarity in this area was raised in response to questions 3, 5, 8 and 12.
- 90 percent of respondents to question 9 were also in favour of implementing a **Decision Support Tool**. Many emphasised that the tool should be a compulsory part of the assessment of eligibility for NHS Continuing Healthcare.
- 76 percent of the respondents to question 6 were fully or mostly in agreement with the suggested domains, with only 5 percent opposed to them.
- 34 percent of respondents to question 6 believed pain management and/or palliative care should be included or emphasised. Other suggested additions included symptom control and sleep disturbances.
- 21 percent of respondents to question 6 felt that mental health and/or learning disability needs were not being taken properly into account. Concerns regarding mental health needs were also raised in response to Questions 3 and 5, with 14 percent of all respondents mentioning this concern.
- Many people suggested that the domain 'Seizures/Altered states of consciousness' should be renamed simply 'Altered states of consciousness' because this includes seizures.
- 26 percent of respondents to question 9 asked for guidance on how many moderate and high health needs would constitute a 'primary health need'. On a related point, a few respondents asked for a **scoring** system.

- Many respondents thought the tool should show the extent of LA powers rather than just a primary health need. Indeed, a total of 25 percent of all respondents raised the issue of the limit of LA powers with respect to questions 3,4,9 and 13.
- Finally, some questioned whether the tool had made sufficient allowance for low-level needs which could combine to create a need for care, such as to warrant Continuing Healthcare.

Our response

- We welcome the positive response to the questions, particularly to the idea of nationally-endorsed tools to aid decision-making.
- We do intend that PCTs should use the Decision Support Tool in all cases where a full assessment is made, to ensure that all appropriate evidence from assessments is gathered and considered fairly and consistently.
- The concern about 'end-of life' care being inconsistent with a needs-based approach was proportionately small compared to the numbers of people who requested greater emphasis on end-of-life care.
- The ability to fast track individuals has been checked to make sure that it is consistent with wider initiatives currently in-hand to improve the quality of end-of-life care, including the ability for individuals to exercise choice. More information of the End-of-Life strategy is available from

www.dh.gov.uk/en/Policyandguidance/Organisationpolicy/Endoflifecare/DH_4106262

- When we published the new versions of the tools after the consultation, we made several changes.

“Screening” tool

- The new draft of the screening tool was named a 'referral' tool, to make it clear that its purpose was to refer for full consideration for NHS continuing healthcare, not to screen out. In most areas the proposed referral tool would fit well within current discharge procedure, where it must be recorded that continuing care eligibility has been considered. However, the people testing the tool found this name unhelpful.
- Because so many people wanted a fast-tracking process as part of the tool (Q8), the draft Referral Tool indicates that prognosis, where available, can be noted as part of the reason for fast tracking. Now, we have separated the two tools, into the “NHS Continuing Healthcare Needs Checklist” and the “NHS Continuing Healthcare Fast Track Tool”

Decision Support Tool

- We accept that, in some circumstances, diagnosis and therefore prognosis may have an impact on determining care needs. The new Decision Support Tool therefore includes a box for noting the diagnosis, should this be relevant to the consideration of needs.
- The 'Seizures/Altered states of consciousness' domain has been renamed as requested.
- We have looked very thoroughly at the tool and talked to the people who have tested the tool to try and make sure that:
 - the needs of patients with mental health problems and learning disabilities can be properly assessed under the proposed framework, and – in particular – that it is made as clear as it possibly could be that NHS Continuing Healthcare can apply

- to people with mental health problems or learning disability as well as to people with physical disability or organic disease
- the tool allows multiple low-level needs to combine to constitute a primary health need.

The four key indicators

Question 4 and 5

What you told us

- 65 percent of responses to question 4 were wholly or partly in agreement with the four key indicators.
- A narrower majority (49 percent against 27 percent) of respondents were positive about the statements used to describe the indicators; almost half of the respondents to question 5 expressed concern that the descriptions were open to interpretation or difficult to understand.
- Many respondents suggested that ‘nature’ should be excluded, renamed or incorporated into other indicators. Specifically, it was thought not to clearly enough express the importance of ‘quality or quantity’. Similarly, several respondents noted that the concept of ‘continuity’ of care was lacking, or suggested that there should be a category for ‘totality’ or ‘volume’ of care which could be related to low-level needs.
- Unpredictability: several respondents thought that this was effectively covered in other indicators. The danger of classifying individuals as ‘predictably unpredictable’ was noted.
- Complexity and Intensity: some respondents thought that the statements were too restrictive.
- Risk and Stability: 18 percent felt that there should be either an additional measure of, or more emphasis on risk, including risk if care were to be withdrawn. Some respondents mentioned similar concepts of stability and the effect on stability of withdrawing care.
- 13 percent of respondents to question 5 said that the relationship between the statements describing the indicators and the Decision Support Tool could be clearer. Many seemed to think of the indicators and the domains as two different sets of criteria, rather than complementing each other.

Our response

- We have emphasised that the risks of removing support or care should be taken into account. “Stability” is not mentioned in the new Framework and being “predictably unpredictable” should never be used as a reason **not** to give NHS Continuing Healthcare. We will be emphasising this in the training material we are developing.
- We recognise the importance of comprehensive risk assessments. Therefore, the Decision Support Tool requires assessors to record that risk assessments have been made, and the descriptions within the domains contain more explicit references to risk.
- The indicators were more controversial than the care domains. Whilst recognising that the indicators have been central to NHS Continuing Healthcare policy, we also recognise that many people find them confusing and unclear.

- We have included descriptions of nature, intensity, complexity and unpredictability in the Framework that are as straightforward as possible and tried to show how the Decision Support Tool can use them to build up a picture.
- Looking at the results of the trial so far, we have seen that people using the tool are able to assess people as eligible for NHS Continuing Healthcare whether they have many lower needs or a few higher needs. We think therefore the Decision Support Tool does capture the concept of continuity or totality/volume. The training materials that we are developing should help people understand these issues.

NHS nursing care

Question 10 and 11

What you told us

- Most respondents agreed that the care planning process was the best stage at which to establish the nursing needs of an individual.
- Many respondents thought that nursing needs could be adequately assessed during the single assessment process or with other existing tools.
- 69 percent of responses to question 11 were in favour of creating a single band for payments of NHS-funded Nursing Care.
- However, there were many financial concerns about the transition risks for current patients, and that the rate was overall too low.
- Some respondents said that the single band was a departure from needs-centred care.

Our response

- We welcome the positive response to the proposal to create a single band for nursing; we believe this will help simplify the system.
- We recognise the role of the SAP (which is currently being developed into the Common Assessment Framework) in assessing older people's needs, as we do the role of other assessment tools for other care groups. The Framework allows people to use those assessment tools to gather the necessary evidence.
- The single rate will not define the package of care; nursing needs should still be met as necessary according to the care plan.
- The rate has been calculated according to the current allocations, so it should be "cost neutral". However, we recognise that there are issues around people currently receiving high band payments and any change to funding will be made upon review rather than immediately on 1 October 2007.
- The full Regulatory Impact Assessment sets out how we have tried to better assess the financial implications.

Comment on the Supporting Documents

Question 12

What you told us

- One concern was that our financial estimates were too low.
- Many people found the Core Values and Principles Document very clear and helpful.

- Many people thought the public information leaflet was helpful.

Our response

- The full Regulatory Impact Assessment sets out how we have tried to better assess the financial implications.
- Because people liked the Core Values and Principles document, we have taken the parts of it which seemed most helpful and put them into the new Framework.
- We will be issuing another public information leaflet in the time leading up to the implementation date.

Some other questions you wanted answers to

Question 13

A number of respondents raised additional questions. Some of these were about individual cases. However, a number of issues were raised by several respondents and this section addresses those most frequently mentioned.

Will you please include case studies in the final Framework?

We have considered the possibility of providing case studies (examples) in the Framework, and discussed this – at length – in the public meetings, and with key groups. The clear consensus was that while case studies will be helpful in training staff in the use of the National Framework (and are being developed as part of the training package), there was a real risk that case studies would become ‘the qualifying criteria’ rather than examples. The intention has always been that eligibility should be based on an assessment of a person’s unique circumstances, not by comparison to another person (real or imaginary).

Will the Framework be retrospective?

All SHAs should have checked their criteria were lawful, following the Coughlan and Grogan judgments and should have been applying those criteria in determining eligibility for NHS Continuing Healthcare. The new Framework will not be applied retrospectively; it is a new system that will apply to all cases on or after 1 October 2007.

Please can we have more guidance on Direct Payments/Individual Budgets?

As explained in paragraph 4.39 of *Our Health, Our care, Our Say* the Government has decided not to extend the principle of Individual Budgets and Direct Payments to NHS care; (Continuing Healthcare is NHS care). This is because to do so would compromise the founding principle of the NHS that care should be free at the point of need.

In our experience, in many situations where Direct Payments have been suggested for NHS Continuing Care, very similar packages of care can be provided by the PCT by commissioning in a way which takes into account the individual’s wishes.

What will happen about equipment provisions?

If someone is eligible for NHS Continuing Healthcare, any healthcare equipment necessary for delivering the care plan will be provided by the PCT. If someone is not eligible, then who funds the care plan should have been agreed between the PCT, the LA and the individual, and this will determine who provides which equipment.

Please can we have more guidance on joint packages?

NHS Continuing Healthcare is funded solely by the NHS: there are no joint packages. However, many areas have arrangements for joint commissioning of services, including when they provide NHS Continuing Healthcare, and this frequently helps to reduce the costs of care. There are also people who do not qualify for NHS Continuing Healthcare and who still have considerable health needs. They may be cared for in a nursing home providing registered nursing care, in which case they will receive NHS-funded Nursing Care. If not, the PCT commissions healthcare to meet those needs wherever the person is living.

How will you address the gap between NHS Continuing Healthcare and the limits of Local Authority powers?

We have been working closely with the Association of the Directors of Adult Social Services, (ADASS), to address any potential for a “gap”. Understanding of this issue has improved on both sides. ADASS are likely to issue their own advice to LAs in addition to the National Framework in due course but we expect that there should, in practice, be no gap. There may be a very few individuals where it is so difficult to decide who is responsible that there could be a risk that neither the NHS nor (subject to the person meeting the relevant means test) the relevant LA, separately or together, might believe it is their responsibility to fund care. We have emphasised in the Framework that this should not lead to a gap in provision, and that LAs and PCTs need to work together to jointly assess people wherever possible, and put in place a solution which meets the individual’s needs in the most appropriate way.

Public information on state benefits

Guidance was published following the Ombudsman’s report; *NHS Continuing Care Redress, 14 March 2007*.

It is available at

http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_073094

Part 3: Conclusion

We warmly welcome the positive response to the consultation and we are grateful for the many thoughtful and helpful responses.

There were several issues which arose which warrant further consideration. To summarise, these fell into three groups: implementation, financial and legal.

Implementation issues:

- Training
- Benchmarking
- Monitoring
- Improving clarity and accessibility

Resource considerations:

- Financial impact of introducing the National Framework
- Financial impact of altering the nursing band system and covering transitions for high band patients
- Resources implications if the number of assessments increases or if assessments take longer

Legal issues:

- Where the line is between Health and Social Care
- Where and how to draw that line in our tools

We have carefully worked through the issues you raised and have aimed to address them in the new Framework. PCTs and LAs will be starting to use the new guidance and tools in October this year. Until that time, there will be various public events and workshops for people using the Framework to help everyone understand the new system.

Annex 1: The consultation questions

Question 1: We recognise that terminology can be complex in this area, and the names given to particular packages of care (e.g. NHS Continuing Healthcare) can cause confusion. We are keen to receive any suggestions for how these core concepts could be renamed to better describe the services they provide.

Question 2: Currently, SHAs hold responsibility for local Continuing Care policies. Following the introduction of the National Framework, we are considering moving this overall responsibility to PCTs as the local commissioning bodies for NHS services. We would welcome your contributions on this proposal.

Question 3: The National Framework sets out to assess individuals on the basis of their need for care, rather than their diagnosis, condition or where the care is provided, as the fairest way to determine eligibility for NHS funding. Does it achieve this or are there other factors which should be considered?

Question 4: We assess an individual's needs with reference to four key indicators - nature, complexity, intensity and unpredictability. Do you think these are the correct indicators, or are there any omissions?

Question 5: Do you have any views on the statements used to describe the key indicators?

Question 6: Assessors will determine whether a primary health need is established by looking at the key indicators in terms of eleven generic 'care domains'. Bearing in mind that professional judgment is paramount, are these the right core areas of need to assess?

Question 7: What are your views on the process shown in the assessment framework? What are the potential implementation issues?

Question 8: Do you agree with the concept of a national screening tool to help promote proportionate and appropriate assessments and to direct resources where they are most needed?

Question 9: We would welcome views on the concept of the national Decision-Support Tool to ensure greater clarity and consistency in decision-making nationally.

Question 10: Do you think that the care planning process is the best place to establish whether an individual requires care from a registered nurse? What are the alternative processes for determining eligibility for NHS-funded Nursing Care?

Question 11: What are your views on the principle of removing the banding system for payments of NHS-funded Nursing Care?

Question 12: We would welcome your views on the supporting documents.

Question 13: If you would like to say anything else about the issues raised by the National Framework for NHS Continuing Healthcare and NHS-funded Nursing Care, please do so.

Annex 2: Written responses

1	Trafford PCTs CC Team	41	Rod Munday
2	Email address only supplied	42	Lynda Miller
3	Rita Morley	43	Lillian Wright
4	Rod Murchie	44	MW Campbell
5	Stephen Johnson	45	Jan Goodchild
6	Roger Hook	46	Jacqueline Foy
7	Tom Crowther	47	Jaci Bee
8	Jeff Heathcote	48	Robert Bateman
9	Peter Unwin	49	Barbara Harris
10	Christine Montague	50	J Faulkner
11	Kathleen Pelham	51	Ruth Nathan (West Sussex CC)
12	Marilyn Wells	52	Peter Jones
13	Maurice Nutter	53	Michele Joss
14	Kevin Green	54	Thomas Higgins
15	Lesley Nethercott	55	Hazel Reese (Powys LHB)
16	Pauline Irving	56	Sue Smith (MND Association)
17	John Dorsett	57	Greater Manchester SHA OP Ref Group
18	George Smith	58	High Peak & Dales PPI Forum
19	Ian Perkin	59	Jeff Silk (Wolves PCT)
20	Bill Drake (Meon Valley Carers)	60	Karen Staples
21	Carolyn Johnson	61	Christine Hyland
22	Tony Luxton	62	Kingston PCT/Royal Borough of Kingston
23	Jan Matthew (Northants Physio Dept)	63	Jack Crossfield
24	Sinead Parry (Royal Marsden Trust)	64	Floyd Pattison
25	Mary Clarke	65	Bedfordshire Heartlands PPI Forum
26	John Burgess	66	Lyn Daniel (Devon CC)
27	Zoe Turner	67	Bristol South & West PCT
28	Sally Roots	68	Terence Perkins
29	Linda Nazarko	69	Winifred Suggett (Darlington PCT)
30	Geoff Smalley	70	British Association of Occupational Therapists
31	Ray Boateng (Essex CC)	71	Jacqueline Millar (Southwark PCT)
32	Jan Holden (NW London SHA)	72	Cheshire CC OP Network
33	Richard Buckland (Easington PCT)	73	Peter Francis
34	Clive Neil-Smith	74	Vanessa Davey
35	Janet Norris	75	Yorkshire & Humber SHA Events
36	Louise Bass	76	Sheffield Carers Centre
37	Pat Shore	77	East Sussex PCTs
38	John Nelson	78	Elizabeth Balsom
39	Sally Steele		
40	Ellen Gray		

79	Harrogate District FT	122	F A Lockhart
80	Margaret Hardingham	123	East Cheshire NHS Trust
81	Paul Phillipson	124	I W Hand (Mr)
82	Pam Briggs	125	Sally Rouse
83	Christine Belshaw (Sheffield SW PCT)	126	Norfolk Elders Advocacy Alliance
84	Huntingdon's Disease Association	127	Enfield Disability Action
85	Home Farm Trust	128	Newcastle-under-Lyme 50+ Forum
86	Haringey Teaching PCT	129	Hampshire PCTs
87	Tony Quinton-Smith	130	William Cuthbertson
88	Bridget Colbran (Eastleigh & Test Valley PCT)	131	Pro Tem Consulting
89	East Midlands SHA	132	Margaret Bryant
90	North Birmingham PCT	133	Brian Todd
91	Linda Everett	134	NHS Confederation
92	J M Thomas	135	Julia Politt
93	Daphne Madley	136	Leicestershire & Rutland H&SC Community
94	W G Sims (Mrs)	137	Humber & Yorkshire Coast Cancer Network
95	P I Fuller (Mrs)	138	Steve McCarthy
96	Arthur Ayres	139	Newcastle Hospitals NHS Trust
97	M R Ware (Mr)	140	Southampton City Council
98	V H Heath (Mrs)	141	Blackpool PCT
99	Judith Holden	142	Joan Heaton
100	J M Oliver (Mr)	143	Exeter PCT Public Event
101	Rosemary Johnson	144	Hartlepool Borough Council/Hartlepool PCT
102	M Eebe-West	145	South Warwickshire & Rugby PCT
103	P Silcock (Mrs)	146	Phil Shaky
104	Jeanne Lockett	147	Barnsley PCT
105	A Hague (Mr)	148	Southampton City PCT
106	S R Cummins (Mr)	149	Tony Gornall
107	C A Rodstrom (Mrs)	150	Bexley Borough Pensioners Forum
108	A J Deacy (Mr)	151	Blackburn with Darwen OP Forum
109	A E Hick (Mr)	152	Sheffield Teaching Hospitals Foundation Trust
110	F G Watts (Mr)	153	Geoffrey Lowndes-Toole
111	Glynis Scarborough	154	Rotherham Pensioners Action Group
112	Dennis Stainer	155	Solicitors for the Elderly
113	M Elcock (Mrs)	156	Soroptimist International Central Birmingham Club
114	Peter Lowe	157	British Geriatrics Society
115	M Horsburgh (Mrs)	158	Walsingham (LD support)
116	Jan Newton	159	NHS Care Info (website)
117	Marie Curie Palliative Care Institute	160	Plymouth City Council
118	North Lincolnshire PPI Forum		
119	W K Lee (Mr)		
120	Alick Grant		
121	Anne Giblin (Newcastle PCT)		

161	Poole PCT	201	NHS South West CC Event
162	Nursing Home Fees Agency (NHFA)	202	Raj Bajwa (Bedford PCT)
163	National Pensioners Convention	203	Croydon PCT
164	Douglas Macmillan Hospice	204	Nottingham City PCT
165	Mr I J Bufton	205	Heart of Birmingham PCT
166	Nottinghamshire County Council	206	Colin Evans (North Birmingham PCT)
167	Durham Dales PCT	207	Emma Bedggood (South Glos PCT)
168	Unknown (YO12 4TP)	208	NHS South East Coast
169	Cheshire Community Voice	209	Surrey & Sussex PCT Alliance
170	Sarah Steele	210	Sheffield PCT OP Services Group
171	Southport & Formby PCT/South Sefton PCT	211	5 Boroughs Partnership NHS Trust
172	Belinda Schwer (Care and Health Law)	212	Carol Wise
173	Frank Hind	213	Progressive Supranuclear Palsy Association
174	Derby City Council	214	Royal West Sussex Trust (Discharge Co-ord)
175	Blackpool Council	215	West Yorkshire SHA
176	Gay Lee	216	Newark LD MDT
177	Devon County Council	217	Bolton MB Council
178	Edward Sotheran	218	North Somerset PCT
179	West Cornwall PPI Forum	219	Jacqui Banks (Thames Hospice Care)
180	Southend Carers' Forum	220	Kensington & Chelsea PCT
181	H E Berrill (Ms)	221	Kim Grosvenor (Age Concern Shropshire)
182	Lancashire County Council	222	Whole Systems Partnership
183	King's College Hospital NHS Trust	223	Graham Newsom
184	Diane Neath	224	Brendoncare Foundation
185	Hampshire Care Association	225	Greg Clare (North Hampshire PCT)
186	Debra Gosling	226	Derbyshire County Council/Derbyshire MH Services
187	Eileen Huish	227	Help the Aged
188	Anne Winship	228	Southern Cross Healthcare
189	Valerie Southan	229	Bexley Care Trust
190	David Northrop	230	Bexley Council
191	Unknown (Blackburn)	231	Greenwich & Bexley Cottage Hospice
192	Suffolk Association of Independent Care Providers	232	Oxleas Foundation NHS Trust
193	NHS London CC Review Panel Chairs Group	233	Bexley Care Trust LD Services
194	Barchester Healthcare	234	Preston Local Health Economy Group
195	Scarborough, Whitby & Ryedale PCT	235	Central Manchester PCT
196	Greater Manchester SHA PCTs' Forum	236	Foundation for People with Learning Disabilities
197	Jean Tottie (Greater Manchester SHA)	237	Brain Injury Social Work Group
198	Royal College of Psychiatrists	238	North Yorkshire County Council
199	Hertfordshire PCTs		
200	Durham & Chester-le-Street PCT		

239	Heather Walsh	279	Hazel Harris
240	Diana Smith	280	Michael Armstrong
241	David Gooch	281	Fiona Pritchard
242	Ina Kitchen	282	Swindon PCT
243	Warrington PCT	283	Carlisle & District Care Forum
244	North Cumbria PCTs	284	North Somerset Council
245	Newcastle City Council/Newcastle PCT	285	Graham Robinson (Norfolk County Council)
246	Age Concern	286	St Catherine's Hospice
247	South Hams, West Devon & Teignbridge PCTs	287	Norfolk PCTs
248	Janet Pugh	288	Wirral PCTs
249	East and North Hertfordshire NHS Trust	289	Cornwall County Council
250	East Lancashire PCT	290	Leeds PCTs
251	London Borough of Merton	291	Halton Borough Council
252	Sheffield PCTs	292	Brian Dobson-Spink (Independent Chair)
253	Nottinghamshire PCTs	293	National Association of Laryngectomees
254	Redbridge PCT	294	Oldham PCT
255	Janet Osbourne	295	Kent County Council
256	Mary Lobb	296	Carers Support Service
257	S Dewiest (Mrs)	297	Blackburn with Darwen Council
258	Phil Shakespeare	298	Ealing PCT/London Borough of Ealing
259	PJ Crowter-Jones	299	John Russell
260	Elaine Horner	300	Manchester North, Central & South PCTs
261	Suffolk West PCT	301	Norfolk County Council
262	Havering PCT	302	Richmond & Twickenham PCT
263	Hertfordshire County Council	303	Solihull PPI Forum
264	Lincolnshire County Council Health Scrutiny Committee	304	Royal College of Nursing
265	Barbara Harrison	305	Wolverhampton PCT/Wolverhampton MB Council
266	Lincolnshire PCTs/MH Trust	306	South London & Maudsley NHS Trust
267	Hampshire County Council	307	Southwark PCT/Southwark Council
268	Lincolnshire County Council	308	South Staffordshire PCTs
269	Lewisham PCT/London Borough of Lewisham	309	Alzheimer's Society
270	Leicester/shire & Rutland H&SC Community	310	Hambleton & Richmondshire PCT
271	Gillian Tame	311	Association of Charity Officers
272	Oxfordshire County Council	312	Avon & Wiltshire MH Partnership Trust
273	Brain Injury Rehabilitation Trust	313	Derby Hospitals NHS Foundation Trust
274	Royal College of Physicians	314	Bath & North East Somerset PCT
275	North Nottinghamshire Health Community	315	Royal West Sussex Trust
276	Wiltshire PCTs	316	Ray Bradshaw (Sunderland PCT)
277	South Gloucestershire PCT	317	Gaynor Evans (Age Concern Shropshire)
278	Wigan MB Council/Ashton, Wigan & Leigh PCT		

318	Age Concern Norfolk	356	North Staffordshire Pensioners Convention
319	Margaret O'Brien	357	North East SHA
320	Neil Feasey	358	Plymouth PCT
321	Anthony McCallum (Guildford PCT)	359	English Community Care Association
322	St John's Hospice	360	Chartered Institute of Public Finance Accountants
323	Peter Williams (South West SHA)	361	Torbay Care Trust
324	Help the Hospices	362	Easington PCT
325	Sue Dove (South Tees Trust)	363	Salford PCT/Salford City Council
326	Enfield Voluntary Action	364	Sedgefield PCT
327	Gateshead PCT/Gateshead Council	365	Manchester MH and Social Care Trust
328	Frances Grant (Derby Hospitals Trust)	366	Lambeth PCT
329	London Borough of Barking & Dagenham	367	Telford & Wrekin PCT
330	Sid Latimer	368	South West Dorset PCT
331	Teresa Wright	369	Harrow PCT
332	Amanda Wollum	370	Nigel Evason (Wandsworth PCT)
333	Deborah Ward	371	Warwickshire County Council
334	Bevan Brittan LLP	372	Optical Bodies Joint Response
335	North Lincolnshire PCT	373	Lorna Archer
336	Homerton University Hospital Foundation Trust	374	Princess Alice Hospice
337	Mary Harrison	375	Katie Foster
338	Leeds City Council	376	North West SHA
339	Greater Peterborough PCP	377	John Crofts
340	National Mental Health Partnership	378	Care Homes Support Team
341	Camden PCT	379	Harrow Council (H&SC Integration Board)
342	G Hopkins	380	Portsmouth City PCT
343	Barnsley MB Council	381	NE Yorkshire & N Lincolnshire SHA
344	Kate Rowland	382	Darlington Borough Council
345	Alzheimer's Society (Woking Branch)	383	Joan Thomas
346	Wakefield West PCT	384	Ashfield & Mansfield PCTs
347	Cordelia Thompson	385	Sandwell PCTs/Sandwell MB Council
348	Cheshire PCTs	386	East Suffolk & Waveney PCTs
349	North Tees PCT	387	Tameside Council (RIQ Forum)
350	Heart of England Housing and Care Ltd	388	Harrow Council (DASS)
351	Judy Dale (South Worcestershire PCT)	389	Prospectus Projects
352	Action for Carers (Surrey)	390	North Warwickshire PCT
353	Wiltshire County Council	391	Bolton PCT
354	West Lincolnshire PCT/Lincolnshire Partnership Trust	392	Northumberland Care Trust
355	Sheffield Council	393	C A Franks
		394	Wirral Council
		395	National Federation of Royal Mail & BT Pensioners

396	Coventry City Council	436	Continence Foundation
397	Miall James	437	Sutton & Merton PCT
398	Counsel and Care	438	Royal College of Speech & Language Therapists
399	Geoff Thompson (Blackpool PCT)	439	Vale of Aylesbury PCT
400	Barnet PCT Workshop	440	South and East Dorset PCT
401	Isle of Wight PCT/Isle of Wight Council	441	Somerset County Council (Health OSC)
402	Royal College of General Practitioners	442	Southend-on-Sea PCT PPI Forum
403	Priory Healthcare	443	Nottinghamshire Care Homes Association
404	Greater Derby PCT	444	Continuing Care Conference (CCC)
405	Nottingham City Council	445	London Borough of Richmond
406	Sunderland Teaching PCT	446	Nicola Brain (Derby Hospitals Trust)
407	British Medical Association		Gloucestershire
408	Parliamentary & Health Services Ombudsman	447	PCTs/Gloucestershire County Council
409	Bedfordshire Heartlands PCT	448	Elizabeth Moffett
410	Suffolk County Council	449	Guide Dogs for the Blind
411	Anita Rush (Berkshire PCT)	450	Newham PCT/London Borough of Newham
412	Greenwich Teaching PCT	451	BUPA
413	Voluntary Organisations Disability Group	452	Chartered Society of Physiotherapy
414	Hounslow PCT/Hounslow Council	453	Frances English
415	Leonard Cheshire Organisation	454	Staffordshire County Council
416	British Association of Social Workers	455	Tower Hamlets PCT/East London & City MH Trust
417	Yorkshire Wolds & Coast PCT	456	Eastern Wakefield PCT
418	Buckinghamshire County Council	457	Langbaugh & Middlesbrough PCTs
419	Luke Clements	458	Alice Stevens (West Surrey PCTs)
420	Civil Service Pensioners' Alliance	459	Worcestershire County Council
421	The Law Society	460	Wyre PCT
422	Relatives & Residents Association	461	Graham Pearson (Swindon County Council)
423	Dudley PCT	462	Selby & York PCT
424	Bournemouth Borough Council	463	Derwentside PCT
425	NHS South West	464	East Riding of Yorkshire Council
426	East of England SHA	465	Staffordshire Association of Registered Care Providers
427	West Midlands ADSS	466	North Derbyshire PCTs
428	Manchester City Council	467	London Borough of Enfield
429	Doncaster East PCT	468	Cheshire County Council
430	Rotherham PCT/Rotherham MB Council	469	P Halsall
431	Susan Shearman	470	Bromley Hospitals NHS Trust
432	Manchester Alliance for Community Care	471	Keith Mercer
433	Stockport PCT	472	London Borough of Brent
434	Bromley PCT		
435	Parkinson's Disease Society		

473 Anchor Trust
474 Joseph Weld & Trimar Hospice
475 Rochdale Council OPMH Group
476 Anna Carrier (Lawns
Neighbourhood Care Centre)
477 Worcestershire Acute Hospitals
Trust
478 Bury Council
479 NHS South Central SHA
480 Exeter Senior Voice
481 Royal College of Physicians of
Edinburgh
482 Enfield PCT
483 Buckinghamshire Brain Injury
Rehabilitation Service
484 LGA/ADSS
485 Tameside & Glossop PCT
486 NW London SHA
487 West Berkshire Council
488 Salford PCT PPI Forum
489 Motor Neuron Disease
Association
490 Islington PCT
491 St Helens Council
492 Trafford South PPI Forum
493 Brian Cockbill
494 Commission for Social Care
Inspection
495 SE Coast Local Authorities
496 Calderdale & Kirklees PCTs
497 JK Hudson
498 Libby Lowe
499 Robin Lovelock

Annex 3: List of meetings

Event/Meeting	Date (2006)	Location
Association of Directors of Social Services (ADSS) – South East Regional Authorities’ Meeting	23 June	London
DH Consultation Events 1&2	10 July	Leeds
DH Consultation Events 3&4	14 July	London
Chartered Institute of Public Finance Accountants – Health and Social Care Panel	20 July	London
CSIP internal meeting	24 July	Colchester
DH Consultation Events 5&6	26 July	Bristol
DH Consultation Events 7&8	27 July	Birmingham
North West London Health and Social Care Community (NHS and Local Authority group)	8 August	London
Royal College of Nursing	22 August	London
Mixed group (hosted by regional Mental Health Trust)	24 August	Lincolnshire
Learning Disability foundation	25 August	London
Mackintosh Duncan Solicitors	4 September	London
English Community Care Association and independent Care Home Providers	11 September	London
Royal College of Nursing; Help the Aged; Age Concern England; Alzheimer’s Society	12 September	London
NHS Strategic Health Authority Continuing Care Leads meeting	13 September	London
ADSS/Local Government Association	14 September	London
Parliamentary and Health Service Ombudsman	20 September	London

