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22<sup>nd</sup> March 2012

Cllr Mark Williams  
Chair, Southwark Health and Adult Social Care  
Scrutiny sub-committee  
160 Tooley Street  
London  
SE1 2TZ

Dear Cllr Williams

### **Proposed Changes to Psychological Therapies Services**

Thank you for your letter of 16<sup>th</sup> March 2012 addressed to Stuart Bell, Chief Executive. As I attended the meeting of the Southwark Council's Health and Adult Social Care Scrutiny Sub-Committee on 14<sup>th</sup> March 2012 to which your letter refers, Stuart has asked me to reply on his behalf.

I would like to begin by apologising that the Trust submitted an earlier draft of a high level Equalities Impact Assessment and then failed to supply you with the updated version reflecting the further work to localise and improve our equalities analysis. This meant your committee members did not have sight of the latest version of the document during our discussion on 14<sup>th</sup> March, and would therefore not have known that some of the concerns they raised had in fact already been addressed by the Trust. We also recognise that patient and public involvement under Section 242 of the NHS Act 2006 is an area where additional perspectives are valuable and are grateful for your suggestions for improvement in respect of the proposed changes to psychological therapies services.

We are pleased that you see your letter to us, following the meeting, as the start of a process not the end. This is because, as I said at the meeting, we are keen to meet soon with you and other significant stakeholders to discuss our service change and QIPP plans for 2012 – 2015. We fully subscribe to the spirit and letter of Section 242 of the NHS Act 2006, recognising the benefits of early engagement with those who use or potentially might use our services in the planning of the provision

of services and in the development and consideration of proposed changes. We also recognise the benefit of early involvement of key stakeholders such as yourselves in helping us think through how we might make the necessary service changes and implement QIPP plans in ways that minimise adverse impacts across all the population. In this respect we are grateful for the recognition in your letter of the difficult financial settlement which the NHS, and all public bodies, find themselves in and your assurance that the committee wishes to work in a constructive manner with all elements of the NHS in Southwark.

We feel this early engagement approach will enable us to work together to agree which areas of change your committee would wish to work with us on particularly closely over the coming period. As I said at the committee meeting we do not think it is helpful to determine the nature of our engagement based on local understanding of 'substantial development or variation' as provided for under the Local Authority [Overview and Scrutiny Committees Health Scrutiny Functions] Regulation 2002. This is because NHS Foundation Trusts are not subject to the same duty to consult with health overview and scrutiny committees in respect of substantial developments or variations in service provision as other NHS bodies. As set out in the Health and Social Care (Community Health Standards) Act 2003 (Supplementary and Consequential Provision)(NHS Foundation Trusts) Order 2004 the duty upon NHS Foundation Trusts to consult health overview and scrutiny committees does not arise over every proposal for a substantial development of the service provided, but only where

- a) the NHS Foundation Trust proposes to make an application to the Independent Regulator ["the regulator"] of NHS Foundation Trusts to vary the terms of its authorisation; and
- b) that application if successful would result in a substantial variation of the provision by the NHS Foundation Trust of protected goods or services in the area of the local authority.

We do not intend to make such application to the regulator for any of our proposed changes in our Forward Plan 2012-2015.

Turning to the substantive issue of proposed service redesign of the Psychological Therapies Services, we have noted the areas of concern in your letter and intend to proactively respond to them by prioritising time of the staff group to undertake further engagement, information gathering and analysis to enable us to deepen our understanding of:

- The current users of the service where staff have already been asked to consult with them using a standard set of information
- The impact of the proposed changes on all people with protected characteristics - so that we can be sure that the Trust and our Commissioners have paid due regard to and have mitigated against any identified adverse impact on all sections of the population as required under the Equality Act 2010. Our attached Southwark specific Equality Impact Assessment provides considerably more information than you had before your committee on 14<sup>th</sup> March.

However, in accordance with your letter, we plan to undertake further work in the areas of:

- sexual orientation and transgender
  - patients with complex psychological and social needs which do not fall into 'standard' diagnostic groups
  - any unintended consequences which might disproportionately affect individuals suffering from different types of conditions
- The possible impact on the availability of unpaid honorary therapists

We note your recommendation that a further full 12 week consultation be held with all parties concerned, including service users and staff and recognise that you have come to this view at least in part because of the limited information we have provided you with to date. We would suggest however that there is a need for a proportionate response to our responsibilities under Section 242 of the NHS Act 2006 and would draw to your attention the consultation and involvement which has already taken place around the proposed service redesign of the Psychological Therapies Services and the associated Care Pathways. The list below sets out the engagement work undertaken to date together with the improvements made to the proposals in the light of the helpful and informative feedback:

#### Engagement with staff and service users together

- Care pathway design workshops were held including staff from psychological therapy services and representatives from the service user advisory group. (February 2011, 28<sup>th</sup> March 2011 and 23<sup>rd</sup> May 2011) The work from these sessions formed the basis of the current proposals by identifying best clinical practice, as well as areas of service functioning that required improvement.
- The service model was developed via a steering group which met between September and November 2011. The group included staff representatives covering a broad range of experience and expertise. The work of the group was regularly discussed with the service user advisory group; 30<sup>th</sup> September 2011, 28<sup>th</sup> October 2011 and 25<sup>th</sup> November 2011.

#### Consultation and involvement with service users and public

- The outline model was discussed with service users from Lambeth, Southwark and Lewisham at a workshop entitled 'Find out / talk about changes to community psychological therapy services' 21<sup>st</sup> November 2011
- Following a meeting with the Lambeth, Southwark and Lewisham Stakeholders Reference Group 14<sup>th</sup> February 2012 we extended our user consultation through running a session with the Southwark LINK 8<sup>th</sup> March 2012. Members of the LINK have expressed an interest in providing ongoing input into our therapy changes and developments.

- In addition; a summary of proposed changes has been provided to all therapists for them, as appropriate, to give to people currently receiving therapy. People in therapy are invited if they wish, to contact members of the management team to ask questions or comment. A plain English version of the proposal is also available.

#### Consultation with staff

- An outline model was discussed with staff at a workshop 14<sup>th</sup> November 2011. This was attended by 70 members of staff.
- The statutory formal staff consultation was held 9<sup>th</sup> December 2011 – 16<sup>th</sup> January 2012. All staff had the opportunity to meet with a member of the management team and human resources during this time.

Consultation meetings were held with staff service teams as follows:

- Maudsley Psychotherapy service 14<sup>th</sup> December 2011
- CPTS (Coordinated Psychological Treatment Services at Guys Hospital) 13<sup>th</sup> December 2011
- TSS (Traumatic Stress Service) 14<sup>th</sup> December 2011
- Community Based Psychologists 21<sup>st</sup> December 2011

We received 77 responses to the formal consultation. The majority of these were from individual staff (62) with the remainder from teams and groups. A copy of the response to the consultation was sent to your office 3<sup>rd</sup> February 2012

Very few people expressed concern about the proposed IPTT service model. The majority of comments referred to the staffing model and issues of transition between the current and proposed model. As a result of the staff consultation a number of amendments have been made including the provision of psychotherapy posts involved in the provision of training and supervision of honorary therapists.

A revised proposal was sent to staff 21<sup>st</sup> February 2012. Since then the following team discussions have been held:

- Maudsley Psychotherapy service 15<sup>th</sup> March 2012
- CPTS (Coordinated Psychological Treatment Services at Guys Hospital) 6<sup>th</sup> March 2012
- TSS (Traumatic Stress Service) 22<sup>nd</sup> February 2012
- Community Based Psychologists 14<sup>th</sup> March 2012

Our assessment is that the staff consultation and engagement is satisfactory and has been carried out in accordance with requirements. All staff have been engaged and have been given and have responded to the opportunities to provide feedback and views both individually and collectively. The views have been useful in shaping the eventual model which, as the staff representative at your Committee observed, is agreed as the most appropriate model by both staff and management.

We estimate that the additional work outlined above to respond to your specific areas of concern will take us a further 4 weeks. We then intend pulling all the material together and presenting it to our Trust Executive for decision. We hope you will agree that this is a proportionate response and would find it helpful if you could appoint an officer of the Council to work with us in identifying Southwark specific population statistics to help us with the further work on our equalities analysis.

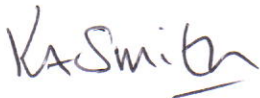
In the light of your concerns we have paused the interview process but would draw to your attention that the process had already commenced. Therefore in the interests of minimising the uncertainty for the staff already interviewed and those awaiting their interviews we would not wish to delay matters beyond what is required for us to undertake the additional engagement and analysis on the issues of concern you have raised in your letter. We are also concerned that further delays, as we outlined at the committee, will prolong the disruption to the service since it is not appropriate to allocate new referrals until we are clear on the disposition of staff across the new service.

We firmly believe that the changes we are proposing will enable us to improve the provision of psychological therapy services for patients. As things stand, a number of services operate in different locations, having developed independently over time. As a product of history, rather than clinical best practice, the current arrangement means that different services may be offered to people on the basis of where they live in the borough rather than for good clinical reasons.

The changes we are planning will lead to the creation of new single Integrated Psychological Therapy Teams (IPTT) which will bring together therapy provision previously delivered in the separate services. They will work alongside our existing community mental health teams (CMHTs) and will provide patients and GP referrers with a single point of access to a range of psychological therapies, according to assessed clinical need.

We look forward to working constructively with you over the coming months and years and are pleased to note that we now have an agreed date of 27<sup>th</sup> April 2012 when we are looking forward to welcoming you and the Southwark Health and Adult Social Care Scrutiny Sub-Committee to meet with us. We would like to share our Forward Plan proposals for 2012-2015 and discuss on going engagement arrangements as the service redesigns are developed.

Yours sincerely



PP- Zoe Reed  
Executive Director  
Strategy and Business Development

Cc Steve Davidson Service Director  
Dr Jonathan Bindman Clinical Director