Dear Ms Lloyd,

Health Service Reconfiguration – Lessons Learned Review

I write in reference to your letter received yesterday asking us to contribute to the above review which you are conducting for Welsh Government.

I have to say that I was extremely disappointed to see you are requesting responses are returned by 4 August 2014, despite you only having issued your request on 24 July 2014. This in effect means that you are allowing less than seven working days for responses to be compiled and submitted.

Hopefully, you can appreciate that for a member-based organisation such as BMA Cymru Wales, which represents doctors from across all branches of practice and therefore over 7000 relevant stakeholders to this review, this is an impossible timescale within which we can meaningfully engage.

To respond to such a review effectively, our staff would require enough time to circulate the details of what we are being asked to comment upon to our members, provide them sufficient time and opportunity to feed back their views, combine those views together into a response which seeks to be representative of the organisation’s viewpoint as a whole and then circulate a draft of that response for agreement. It is simply not possible for this to be done properly within such a tight timeframe, particularly given the fact our members have busy working lives and our staff are already dealing with a substantial number of other consultations and inquiries, including from Welsh Government and National Assembly committees.

Furthermore, the failure to propose an adequate time-frame in which responses can be submitted is compounded by the review being undertaken during the summer holiday period when key individuals within our membership and staff may well be on leave, and others are having to cover for absent colleagues.

We are concerned that a key lesson to be learned in regard to health service reconfiguration may well be the need to ensure that proper process is followed throughout, particularly with regard to consultation and engagement. It is therefore surprising that a review as important as this should fail to be undertaken using a process that could regarded as an example of good engagement practice. A cynic might suggest the timescale had been chosen to limit the extent to which stakeholder organisations can effectively engage with this review. We would therefore be concerned that the validity of any findings from the review will be open to challenge as a result.

Given the concerns I have outlined, I regret that BMA Cymru Wales has therefore concluded that it will not be able to respond. That is a matter of regret to us since our members engaged heavily with all three regional service reconfiguration plans. However, we consider we have little choice as we simply do not feel we would be able to respond effectively within the very limited timeframe offered.
We hope you are able to understand our viewpoint, and will as a result give thought to modifying the process so that a more meaningful level of engagement can be achieved.

Yours sincerely

Dr P Banfield
Chairman
Welsh Council

cc: Prof Mark Drakeford AM, Minister for Health and Social Services
    Dr Andrew Goodall, Director General, Chief Executive, NHS Wales
    Dr Ruth Hussey, Chief Medical Officer