

You said, we did: Response to the consultation feedback on the NHS CHC placements policy

Following the public consultation by Barking and Dagenham, Havering and Redbridge Clinical Commissioning Groups (BHR CCGs) - from 8 July to 30 September 2019 - on our proposed NHS continuing healthcare (CHC) placements policy, a number of issues and concerns were raised.

We have listened to these concerns and responded below.

You said	We did
<p>We have concerns about people's rights to advocacy within the CHC process, and around advocacy in general for people and their family or representatives going through the CHC assessment and eligibility process.</p>	<p>The CCGs' CHC Team sign post and refer people for both advocacy and interpretation services as required, however we acknowledge that this access is not always straightforward.</p> <p>To address this, an Appendix has been added to the CHC placements policy providing guidance on access to advocacy and detailing the advocacy contacts in all three Local Authority areas.</p>
<p>Will the policy result in people in receipt of CHC who are approaching end of life, dying in a care home when their preference may be to die at home?</p>	<p>The CHC placements policy states that "fast-track" palliative care (i.e. those patients at the end of life) is an exclusion. This applies equally to cases where people are already funded for standard CHC and then become eligible for fast-track palliative care; as well as people who are newly eligible for funded fast-track care and were not previously receiving standard CHC.</p> <p>The policy has been updated to make this clearer.</p>
<p>We are worried that the policy will mean that patients could be forced into a care home against their wishes, separating them from their family and close networks, which will impact on their quality of life.</p>	<p>It is expected that there will only be a small number of patients (around 20-25 a year) who the CCGs will not support to live in their own homes, where this is a clinical option and all factors have been considered. In these cases the CCGs will consider the case for exceptionality. In complex cases the CCGs will bring additional clinical expertise into the decision-making panel.</p> <p>Note, there is an appeal process which includes lay member representation should patients remain unsatisfied.</p>

<p>We think that residents who do need a nursing or care home placement should be able to stay in their own borough.</p> <p>Nursing homes need training to ensure they can meet cultural needs.</p>	<p>BHR CCGs offer a good range of local care and nursing home provision within each of the three boroughs, from a range of providers able to meet the needs of the majority of CHC funded residents and provide choice.</p> <p>There are 36 care homes in the BHR area which cater to a range of cultural needs.</p> <p>The CCGs have access to a map of all nursing homes in London, which we can share with families to aid them in understanding local provision.</p>
<p>It is important to take a person centred approach to decision making. We need to avoid the application of the policy becoming a “tick box” exercise.</p>	<p>People whose needs can be met in their own home now have a right to receive an NHS Personal Health Budget (PHB) and they are informed of the cost of their home care package - known as a Notional Budget - by default. This means they are also able to have more control over how they would like this to be delivered.</p> <p>A Support Care Plan is put together jointly with the individual to ensure that identified health outcomes can be agreed and a plan of support put into place to meet those health outcomes.</p> <p>The CCGs have a Personal Health Budgets Lead who oversees this process and is contactable by the public if they have any concerns.</p>
<p>The CHC process needs to be smoother for the family and carers, and they need to be supported through the process.</p>	<p>We recognise that CHC is a very complicated process. The CCGs have a team available Monday-Friday from 9am-5pm to support families and carers. Their contact details are on all letters sent out and they are contactable by letter, phone or e-mail.</p> <p>To make things clearer our CHC operational policies are being updated in order to make them more accessible. The final policies will be published on the CCGs’ websites, which can be accessed by the public.</p>