Continuity of Services consultation
Monitor
4 Matthew Parker Street
London
SW1 9NP
[By email]
8th November 2012

Dear Continuity of Services consultation colleagues at Monitor

Re: Monitor guidance for commissioners: ensuring continuity of health services and designating Commissioner Requested Services and Protected services – Royal College of Nursing Response

This letter provides the RCN’s response to Monitors proposals: Monitors guidance for commissioners.

General comment
The RCN is concerned about continuity of services, particularly those services that are truly essential, as it is becoming increasingly clear the pressure that providers are under, including the very first instance of an NHS Trust being subject to the failure regime with a Trust Special Administrator in place. The approach set out in the consultation rests on commissioners designating services and closer scrutiny of those services by Monitor. Commissioners will need to lead this, and consider not only quality and sustainability of their providers, but also the interdependencies across and between different providers in their local health economy. For the whole process to work well to ensure continuity of services, it rests on well-informed commissioners and appropriate consideration of the realities on the ground. This highlights the importance of broader support to commissioners, and that includes support for nurses in commissioning roles.

Specific comments
We are well aware that our members face considerable demands on their time, and we know that others involved in commissioning do too. It would seem to be more proportionate to focus on the approach of a call for evidence rather than notifications of deviation from commissioners when Monitor is conducting its periodic review of the guidance and framework for designating Commissioner Requested Services and Protected Services. That would also have the benefit of being more up to date at the time that this information is of most use to Monitor.

In terms of how often Commissioners should revisit their designations, this is a difficult question to answer when there is significant scope for local determination of CRS and there could be changes in the specific services as a result of reconfiguration, or changes to services in the desire to deliver more integrated services. In practice we believe that commissioners will need to ensure their providers alert them in advance to changes in service provision that are both being planned and implemented. We believe that commissioners should also make sure that they formally review at least at the point where
they are planning a major commissioning round (which depending on the length of contracts will vary).

Please do not hesitate to contact the RCN should you wish to discuss these issues further.

Kind regards,
Howard Catton
Head of Policy and International