

FAO: Dr Rosie Benneyworth CQC Chief Inspector of Primary Medical Services and Integrated Care

Dear Dr Benneyworth,

Re: Proposal to Close Sandiway Surgery

FORMAL COMPLAINT

We are writing on behalf of patients of Sandiway Surgery, a Danebridge Medical Practice (DMP) branch to formally complain regarding the proposed closure of Sandiway Surgery. We have already produced a report, "Case for Retention of Sandiway Surgery" for the CCG PCCC when they met in November last year to discuss the proposal. (See attached)

We believe that the proposed closure of Sandiway Surgery, will adversely affect the quality of care for the whole of the DMP patient list. This is based on existing patient experience prior to the pandemic when the Sandiway surgery was still open.

DMP has chosen to close the surgery before any arrangements have been put in place to ensure that vulnerable patients both young and old can access primary care close to home from a GP or other suitably qualified professional. We have heard that there are future plans for Integrated Care but none of these exist for Sandiway patients now.

We did write to you in early 2020 to clarify some points raised in your May 2019 inspection report, but also because we felt that your report had been misrepresented to the patients by DMP, and was being used to justify their decision to seek closure. Ms Watson's response to our FOI request is attached (CQC IAT 1920 1155).

We bring this issue to your attention now as it seems likely that you will be undertaking your follow up inspection of Danebridge Medical Practice in the very near future.

Closure of the Sandiway surgery will reduce the facilities offered by the Practice to their two surgeries in Northwich, which are just over a mile apart. Leaving aside the immediate detriment to the 3500 patients in the Cuddington, Sandiway and Delamere Park villages, who will have to travel 5 miles to the Northwich surgeries without direct public transport, the central facilities will be required to handle an additional ~16% of patients.

Having been directed by both the CWaC OSC, and then the CCG PCCC, Danebridge had to re-engage in consultation with its patients at the end of 2020. DMP chose to do this using very small focus groups (less than 40 patients involved) via Teams meeting technology, thereby accessing only a few patients and by-passing those not able to use internet communications. The way the consultation was held, on-line, via Teams, was contrary to the Equality Act 2010 in that it indirectly discriminated against patients in respect of age and disability.

We are attaching the responses to the CCG Focus Group survey of 182 patients (carried out in April 2021) that identify both the desire of village patients for the surgery to remain open, and some of the difficulties encountered accessing services from the practice before the onset of the pandemic. Please note that these comments are made by people who are computer and Internet literate; those patients who do not have the equipment or the capability to use the Internet are clearly in a worse position.

These issues include: -

- (i) Difficulty in booking appointments – both in using the phone and electronic access systems.
- (ii) Having eventually got through to the centre the lack of availability of appointments in reasonable timescales.

(iii) Difficulties in handling prescription issues including, once again, issues of communication with the central facilities.

(iv) Concerns about the handling of samples given the inaccessibility of the two central facilities by public transport.

Within our own experience we have found the practice philosophy of employing large numbers of part time GPs means it is difficult, or seemingly impossible, for patients to get any continuity of treatment by a particular doctor.

It should be noted that the limited number of survey responses is a result of the Practice not publicising the availability of the survey. Only those selected by the Practice to be part of their focus groups were made aware of its existence, DMP subsequently placed the survey on their website. In the midst of a pandemic when patients did not want to bother their GPs unnecessarily, very few people would have visited the DMP website.

We note also that the Practice is claiming that the number of complaints about the proposal to close Sandiway Surgery is zero, which is not surprising given the difficulty in navigating their complaints process. Access to the DMP complaints system is at best off-putting and at worst impossible for those not proficient with computers. The Health and Social Care Act 2008 (Regulated Activities) Regulations 2014: Regulation 16 states that a provider must have “an effective and accessible system for identifying, receiving, handling and responding to complaints from people using the service”.

Couple this with the government request to limit interactions to those of real medical consequence during this pandemic period, then a lack of formal written complaints is to be expected. It does not, however, reflect the real concerns of patients. (See survey responses)

We request that the statement that no complaints have been received about the proposal to close Sandiway Surgery should be challenged in the current CQC inspection.

We believe you will be aware of the inherent difficulties in using remote consultations that are emerging as a result of the impact of the pandemic. These are likely to affect the elderly particularly, and those who do not have access to, or capability to use the equipment necessary to support such consultations, and will significantly impact access to care for vulnerable patients both young and old, particularly in a remote community such as ours, with a higher than average ageing population.

Based on the above, we believe that a significant increase in efficiency will be required of the Practice in order to handle the additional load on the two remaining surgeries arising from the closure of Sandiway, coupled with an inevitable increase in the need for home visits. The Practice will be able to give you the number of appointments handled by Sandiway when it was working ‘normally’ i.e. pre-pandemic both before and after the Practice decided to reduce the nurse coverage at the surgery.

As well as looking into the complaints about service indicated above, we request that you consider the necessary change in working practices to deliver the increased efficiency. We would like you to establish to your satisfaction that it is possible, and will not result in an adverse impact on the quality of care across the whole practice.

Yours sincerely,

On behalf of the Save Our Surgery Action Group and Cuddington Parish Council.