Review of Minor Injuries and Illness Units in Gloucestershire

ENGAGEMENT OUTCOME REPORT

MINOR INJURIES & ILLNESS UNITS’ REVIEW

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<th>VERSION:</th>
<th>1.0</th>
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<tr>
<td>DATE OF REPORT:</td>
<td>6 September 2016</td>
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<tr>
<td>AUTHOR:</td>
<td>Rod Brown, Head of Planning, Compliance and Partnerships</td>
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<td>LEAD EXECUTIVE:</td>
<td>Candace Plouffe, Chief Operating Officer</td>
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The author would like to thank the following:

- the Gloucestershire public for engaging with the debate and providing comments and feedback
- colleagues across Gloucestershire Care Services NHS Trust for supporting and championing the Review
- partner organisations, and in particular Healthwatch Gloucestershire, local Leagues of Friends and Village Agents, for helping disseminate the information
- NHS Gloucestershire Clinical Commissioning Group, including for the use of the Information Bus
1. Executive summary

- The need to review the opening times of the seven Minor Injuries and Illness Units (MIUs) across Gloucestershire was prompted by the recommendations of the September 2015 Care Quality Commission (CQC) report into Gloucestershire Care Services NHS Trust (the Trust).

- The Review sought also to:
  - address the challenges of nurse recruitment faced by the Trust, particularly for specialist roles such as Emergency Nurse Practitioners (ENPs);
  - ensure a safe, consistent, reliable MIU service for the people of Gloucestershire which represents best use of public resources: as such, all three options for change proposed by the Review, were identified as requiring additional investment and were therefore not offered as cost-cutting measures.

- The Trust sought independent legal advice into its engagement plans, and acted accordingly: in particular, the advice recommended that the Trust should hold widespread discussion about a number of possible options for change. The legal advice was also clear that whilst public opinion should absolutely be considered when making a final decision, opposition to any option ultimately preferred by the Trust should not dissuade action, but would require the Trust to evidence valid reasons for its choice.

- Prior to launching a seven week engagement on the options for change, the Trust spoke to key stakeholders including NHS commissioner and provider partners, Healthwatch Gloucestershire, local GPs, councils and MPs.

- The engagement reached a wide audience across Gloucestershire, as demonstrated by the 1,170 people who responded to the Review survey. This compares favourably to the 239 surveys received by Gloucestershire Hospitals NHS Foundation Trust in response to its three month “Right Care, Right Time, Right Place” consultation in 2013, and the 352 surveys received by the NHS Gloucestershire Clinical Commissioning Group in response to its “Joining Up Your Care” eight week engagement in 2014.
• Other evidence of engagement - 8,000 information booklets were distributed, a Facebook campaign reached 80,966 people of which 1,573 engaged directly, 195 people attended the public engagement events, and 78 attended staff information events

• The option for change preferred by the public was option 2 (to change the hours of the MIIUs in Cirencester and Stroud to 8am-11pm) with 39.1%; second was option 3 (to change the hours of the MIIUs in Cirencester and Stroud to 8am-11pm, and one of the MIIUs in the Forest of Dean to 8am-8pm) with 32.3%. Option 1 (to change the hours of all seven MIIUs to 8am-8pm) received 22.6%, with 6% registering comment but no vote

• A decision on the future opening hours of MIIUs across Gloucestershire will be taken at the Trust Board on 20 September
2. Background to the MIIU Review

2.1 The issues

Gloucestershire’s Minor Injuries and Illness Units (MIIUs) offer timely support to people with urgent, but not life-threatening, healthcare needs. As such, MIIUs provide care and treatment for conditions and injuries such as sprains, cuts and wounds, skin problems such as rashes, bites, stings and infections, minor eye injuries, minor fractures and minor head injuries etc. MIIUs therefore offer a real alternative to the Emergency Departments in Gloucestershire Royal and Cheltenham General Hospitals, and indeed, provide a more suitable setting for the care and treatment of minor injuries and minor illnesses.

Currently, there are three different opening hours for MIIUs across the county as shown below:

Table 1: Current MIIU opening times

<table>
<thead>
<tr>
<th>Opening hours</th>
<th>MIIU site</th>
<th>Locality</th>
</tr>
</thead>
<tbody>
<tr>
<td>24 hours</td>
<td>Cirencester Hospital</td>
<td>Cirencester</td>
</tr>
<tr>
<td></td>
<td>Stroud Hospital</td>
<td>Stroud / Dursley</td>
</tr>
<tr>
<td>8am-11pm</td>
<td>Dilke Hospital</td>
<td>Forest of Dean</td>
</tr>
<tr>
<td></td>
<td>Lydney Hospital</td>
<td></td>
</tr>
<tr>
<td>8am-8pm</td>
<td>North Cotswolds Hospital</td>
<td>North Cotswolds</td>
</tr>
<tr>
<td></td>
<td>Tewkesbury Hospital</td>
<td>Tewkesbury</td>
</tr>
<tr>
<td></td>
<td>Vale Hospital</td>
<td>Stroud / Dursley</td>
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In June 2015, the Care Quality Commission (CQC) undertook an independent assessment of Gloucestershire Care Services NHS Trust (the Trust), the organisation which runs these MIIUs. This assessment concluded that the MIIUs required improvement. This was due to the need to:

- review and take prompt action to ensure that MIIUs are consistently staffed by sufficient numbers of suitably qualified, experienced and skilled staff;
- ensure that people arriving at MIIUs receive prompt assessment (triage) by an appropriately trained and experienced registered nurse;
- monitor and take appropriate action to ensure that staff receive regular mandatory and essential training;
- monitor and take appropriate action to ensure that equipment, medical devices and medicines are regularly checked;
- develop and improve systems, processes and governance arrangements to assure high-quality, effective and safe care and treatment;
- investigate incident reporting levels, encouraging staff to report incidents, including near misses, and ensuring these are acted upon and lessons learned and disseminated;
- ensure that people seated in MIIU waiting areas can be observed by staff;
- ensure that in Stroud General Hospital, triage takes place in an enclosed and private area to allow private discussion and examination;
- improve monitoring systems and take appropriate action to ensure that MIIU premises and equipment are regularly cleaned;
- improve joint working with out-of-hours GP services to ensure that the care pathway is seamless, and the service convenient and reliable; also work with the local mental healthcare trust and emergency departments to ensure that MIIU staff are supported to assess and select the appropriate care pathway for people presenting with mental health concerns.

Between June 2015 and June 2016, the Trust successfully addressed most of these issues. For example, clinical leadership was significantly strengthened by the introduction of an MIIU Matron role, and this led to enhanced standards of quality and safety. Also, new staffing arrangements were introduced so that initial triage was always undertaken by a fully qualified professional. Similarly, internal control systems and processes were reviewed and improved, in relation to incident management, joint working practices and staff training.

However, there remained four fundamental challenges to the Trust’s ability to deliver high-quality, safe services in line with CQC recommendations:

1. **Nurse recruitment.** It was a recommendation of the CQC that MIIUs have at least two qualified nurses on duty at all times, one of whom should be an Emergency Nurse Practitioner (ENP). However, as with most other NHS organisations nationally, the Trust has found it difficult to recruit nurses and particularly those with specialist skills such as ENPs. For this reason, the Trust has sometimes found it impossible to staff the MIIUs, meaning that on occasion, MIIUs have needed to close temporarily at short notice rather than operate unsafely. This is far from ideal, and therefore to address this - in addition to on-going recruitment campaigns - the Trust recognised the potential requirement to change MIIU opening hours. This would enable ENPs and other colleagues to be reallocated from overnight cover where very few people are seen, to daytime shifts where their skills could be better utilised and the role would be more professionally rewarding.
2. **Value for money.** Although there is an overall increase in the use of MIIUs (i.e. attendances increased by 7% in 2015-16 compared to 2014-15, resulting in over 70,000 attendances per year), the numbers of people attending the overnight MIIUs remains relatively and consistently low. For example, in 2015-16, there were an average 4.49 attendances per night between 11pm and 8am at both Stroud and Cirencester combined (or 0.25 people per hour per site), compared to 87.06 attendances between 8am and 11pm at both sites combined (or 2.90 people per hour per site). This raised the question of whether overnight cover remained a viable option.

Equally, in the Forest of Dean, there were an average 4.43 attendances per night between 8pm and 11pm at both Lydney and the Dilke combined (or 0.74 people per hour per site), compared to 50.64 attendances between 8am and 8pm at both sites combined (or 2.11 people per hour per site). This suggested that there may be sufficient capacity to meet demand in one MIIU in the Forest of Dean after 8pm.

3. **Right place for care.** Whilst there is no doubt that MIIUs offer choice for people with urgent healthcare needs, it is also important to ensure that those people who do attend the Units are in the best place to receive care. To investigate this further, the Trust’s Medical Director looked at MIIU attendances in 2015-16 outside 8am-8pm. This analysis was then further supported by a series of clinical audits. Together, these assessments concluded that 90% people attending MIIUs between 11pm and 8am, were either sufficiently well and could have visited the MIIU or seen their GP the following day, or were seriously injured or seriously ill and should have gone immediately to an acute hospital. Therefore, it was concluded that the overnight service in an MIIU is not always the best option for local people.

4. **Recognisable opening times.** As detailed in Table 1 above, there are currently three different operating times for MIIUs in Gloucestershire, which is inequitable and can create difficulties for recognition and understanding of what services are available at what times. It was therefore suggested that greater consistency in opening hours countywide could hugely benefit public awareness of service availability.

Given these four challenges, the Trust acknowledged the value in undertaking a full review of MIIU opening times across Gloucestershire. In doing so, the Trust also recognised the very clear need to ensure the involvement and participation of local people in the discussion, so that the voice of the Gloucestershire public would be heard, and serve as a key consideration to any future decision on service provision.
2.2 Legal advice

Before taking any action in this matter, the Trust sought independent legal advice from DAC Beachcroft which was received on 8 April and 29 April 2016. The key points of this advice, and the Trust’s response, was as follows.

Table 2: Legal advice and Trust response

<table>
<thead>
<tr>
<th>Legal advice</th>
<th>Trust response</th>
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<tr>
<td>The Trust was reminded of its duty under the terms of The NHS Act 2006 section 24 (1B), to engage and involve the public in relation to any proposed changes to MIIU opening hours: moreover, it was reiterated that this activity should be proportionate to the changes proposed, and as such, a minimum of 30 days engagement with the public and key stakeholders was recommended</td>
<td>The Trust recognised its statutory responsibilities in undertaking proportionate dialogue with the public across Gloucestershire. As such, the Trust chose to undertake a seven week (49 days) public engagement exercise, with extended lead-in time for discussions with key stakeholders (see section 2.4 below)</td>
</tr>
<tr>
<td>In proposing changes to MIIU opening hours, the Trust was advised not to (i) make a decision without adequate public engagement, or (ii) act to pre-determine the result of the engagement, or (iii) make a decision which makes a subsequent engagement exercise redundant</td>
<td>The Trust took no pre-emptive action to reconfigure its MIIU services until the conclusion of the engagement process. This resulted in the continuation of ad-hoc closures where insufficient numbers of staff were available to provide a safe service at a number of the MIIUs</td>
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<td>The Trust was advised that a change in MIIU opening hours would not require a full 12 week public consultation which would otherwise be required for substantial variations / changes in services, but there would be an expectation of some public involvement prior to a final decision being made by the Trust. This should include more than information giving i.e. simply informing the public that the Trust is changing MIIU opening hours</td>
<td>The Trust chose to undertake a comprehensive engagement schedule as detailed in section 3 below, in order to secure public involvement. As a core element of this engagement, the Trust also chose to offer the public, three distinct options for future service delivery upon which their views and opinions would be actively canvassed prior to any decision being taken by the Trust Board</td>
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### Legal advice

In order to meet the necessary threshold for public involvement, it was recommended that there be engagement of the public via the Trust website and with local Healthwatch representatives. Some formal engagement with the Health and Care Overview and Scrutiny Committee was also advised.

### Trust response

As is described more fully in section 3 below, the Trust used its public website to carry full details of the MIIU Review, and to enable people to express their opinions on the available options. Equally, both prior to, and throughout, the engagement process, the Trust worked closely with Healthwatch Gloucestershire as well as with the local Health and Care Overview and Scrutiny Committee.

The Trust was advised to produce a short public document, to be made available in both paper and digital form, that would set out the Trust’s proposals, and indicate simply and clearly why the change in MIIU opening hours was deemed desirable and necessary.

An eight page information booklet was produced prior to the start of the engagement - this was distributed in both physical and digital forms. It was accompanied in the physical form by a Freepost reply-paid card, as well an online survey, giving people opportunity to indicate their choice of option, and also to leave their comments.

The Trust was asked to provide sufficient information to allow people to understand and respond to the proposals.

The Trust made a range of information available as part of the engagement. This included details within the information booklet, as well as additional information which was accessible during the public engagement sessions. Furthermore, the Trust responded to any supplementary requests for information which were received. For example, the Trust responded to a detailed request for activity data that was made by Geoffrey Clifton-Brown MP (Cotswolds): this was subsequently published in the Wilts and Gloucestershire Standard on 9 August 2016.
<table>
<thead>
<tr>
<th>Legal advice</th>
<th>Trust response</th>
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<tr>
<td>The Trust was advised to comply with Equality Act duties</td>
<td>The Trust sought to make the information booklet as widely available as possible so as to reach all local communities. The booklet also encouraged anyone wanting it in an alternative language or form to contact the Trust. For example, the booklet was made available in EasyRead (see appendix 2 below) and cascaded via Inclusion Gloucestershire. The Trust also ran an engagement event at the Friendship Café in Gloucester, a central hub for members of the local black and minority ethnic community. It is also noted that the Proposal Paper which will be presented to the Trust Board on 20 September making the case for change, will be supported by a Quality / Equality Impact Assessment, demonstrating that robust consideration has been given to the potential impact of change upon all local communities and population groups</td>
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<td>The Trust was advised that responses to the engagement must be properly taken into account when making the final decision. This does not mean that the option finally proposed by the Trust should be withdrawn because of public opposition, but it does require the Trust to have valid reasons for supporting this option</td>
<td>The Trust noted this recommendation, and will ensure that the Proposal Paper which will be presented to the Trust Board on 20 September, will make suitable reference to this outcome report</td>
</tr>
<tr>
<td>The Trust was advised to publish its final decision as soon as possible after the decision is made, giving reasons</td>
<td>This outcome report is dated 6 September: the Proposal Paper will be presented to the Trust Board on 20 September</td>
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2.3 Options development

Further to the Trust’s decision to undertake a review of MIIU opening hours as detailed in section 2.1 above, and following discussions with both the Trust’s legal advisors (see section 2.2 above) as well as the Gloucestershire Clinical Commissioning Group, it was agreed to develop a series of options for future operation, and present these to the local public for consideration.

However, given the particular issues of overnight nurse recruitment now made more challenging as a result of the CQC recommendations, as well as the low numbers of people appropriately attending the MIIUs in Stroud and Cirencester between 11pm and 8am, it was concluded that there would not be a “Do nothing” option, as the 24 hour MIIU service was no longer deemed safe, viable or sustainable.

The three options therefore identified were:

- **Option 1**: To change the opening hours of all seven Gloucestershire MIIUs to 8am-8pm
- **Option 2**: To change the opening hours of the MIIUs in Cirencester and Stroud to 8am-11pm
- **Option 3**: To change the opening hours of the MIIUs in Cirencester and Stroud to 8am-11pm, and also the opening hours of one of the MIIUs in the Forest of Dean (either Lydney or the Dilke) to 8am-8pm

These options were fully evaluated prior to inclusion within the Review: this demonstrated that all three proposals would require further annual investment of between £210,000 and £460,000 due to the additional clinical posts required, and changes in staff rotas necessary to meet the minimum safe staffing levels recommended by the CQC. Therefore, the Trust was clear that this Review was not about cost-cutting (it is noted however, that most of the media coverage surrounding this engagement exercise did erroneously refer to it being driven by cost-cutting measures).

It is also noted that in undertaking this Review, the Trust was fully aware of a number of other healthcare reviews being led simultaneously across the county: in particular, those focusing upon the future of urgent care services in Gloucestershire, and a separate project exploring the future of health and social care services in the Forest of Dean. However, due to the need of the Trust to respond promptly and effectively to the CQC report, it was decided that the MIIU Review could wait no longer. Nevertheless, there was recognition that the outcome for the MIIUs could potentially change again at a later date given the findings or recommendations of these other reviews.
2.4 Early engagement

In the months leading up to the MIIU Review, the Trust engaged with key stakeholders in the following three phases:


From the time of the CQC visit to the launch of the MIIU Review, full and frank conversations were routinely held with:

- the Trust Board;
- the NHS Gloucestershire Clinical Commissioning Group;
- the Trust’s regulators (the NHS Trust Development Authority until 31 March 2016, and NHS Improvement thereafter).

These conversations were suitably supported by detailed and comprehensive analyses of potential operating and staffing models, as well as robust assessment of MIIU activity for the previous three years, in order to help identify the best possible options for the future provision of safe, high-quality, consistent and reliable MIIU services.


In the lead-up to the launch of the Review, the Trust engaged with the following key stakeholders:

- the Health and Care Overview and Scrutiny Committee (HCOSC): on 17 May, the Trust outlined to HCOSC, the rationale for the forthcoming MIIU Review. Subsequently, a full presentation detailing the three options under consideration, together with plans for the public engagement, were clarified at the HCOSC meeting on 12 July, at which HCOSC members also had opportunity to ask questions of the Trust Chair, Chief Executive and Medical Director;

- Healthwatch Gloucestershire: the Trust kept Healthwatch Gloucestershire fully appraised of its intentions to undertake a public engagement exercise in the months prior to the Review;

- Leagues of Friends: discussions were held with all Leagues of Friends across Gloucestershire, although there was particular focus given to Leagues within those localities where change was proposed (namely, Stroud League of Friends, Cirencester League of Friends, Dilke League of Friends and the Friends of Lydney Hospital);
primary care: the Trust’s Medical Director spoke regularly with locality GP leads before the Review’s launch. Additionally, the Accountable Officer and Clinical Chair of the NHS Gloucestershire Clinical Commissioning Group formally wrote to all GP Executive Leads on 11 July, to make them fully aware of the Review, and to ask them all to respond to the options within the seven week engagement period;

local MPs: in areas where change was suggested by the three options, local MPs were kept briefed by the Trust’s Chief Executive, Chair and Chief Operating Officer;

other local NHS provider organisations: the Trust’s partners, and in particular, Gloucestershire Hospitals NHS Foundation Trust, were given a number of opportunities to discuss potential impact upon their services as a result of the proposed changes to MIIU opening times.

3. 12 July 2016

On the day before the Review’s launch, the Trust undertook the following:

- a letter, together with an electronic version of the information booklet and an invitation to attend the planned stakeholder engagement sessions (see Table 4 below), was sent by the Trust’s Chief Executive to key stakeholders and community leaders. These included, but were not limited to:
  - local district, parish and town Councils, as well as Gloucestershire County Council;
  - local voluntary sector organisations such as Gloucestershire Deaf Association, Inclusion Gloucestershire, Age UK Gloucestershire, Carers Gloucestershire, Barnwood Trust and Gloucestershire Older People’s Association;
  - local housing associations including Two Rivers and Wyedean;
  - local Citizen Advice Bureaux;
  - local hospices;
  - local education establishments such as Gloucestershire College, Royal Forest of Dean Campus and Royal Agricultural University;

- a media briefing was held so as to inform local newspapers and radio stations about the planned engagement, and to direct their readers / listeners towards the public engagement events in July and August. The story received significant coverage at this time: moreover, high press interest was sustained throughout the period of the Review.
3. **Main engagement activities**

3.1 **Printed materials**

In order to raise awareness and understanding of the rationale for the MIIU Review - and to outline the options for change - the Trust developed a detailed information booklet, in line with legal advice (see section 2.2 above). This was an eight page full colour brochure, which was accompanied by a Freepost reply-paid postcard that enabled the public to provide feedback and commentary upon their chosen option.

Initially, 5,000 information booklets and reply-paid cards were printed by the Trust: however, by the third week of the engagement, it became evident that these materials were in high demand, so an additional 3,000 copies of each were produced. By the end of the engagement process, most supplies had been exhausted.

These information booklets and reply-paid cards were made available as widely across Gloucestershire as possible, with the ambition to reach as broad a demographic as possible. A summary of the primary distribution channels is as follows:

- information booklets and reply-paid cards were provided to each of the Trust’s seven community hospitals / MIIUs. These were displayed in a prominent location at each site, alongside an eight foot promotional banner, which was intended to draw attention to the Review and encourage public participation. The Trust also provided a “postbox” at each of the hospitals so as to enable people to quickly and easily provide their feedback. A number of hospitals, and in particular Cirencester, used their initial supplies very quickly, and these were routinely restocked throughout the engagement period;

- information booklets and reply-paid cards were provided to Gloucestershire County Council in order that they could be distributed via appropriate sites across the county, including public libraries and children’s centres (NB a number of District Councils across Gloucestershire provided an additional channel via which booklets and reply-paid cards were circulated);

- the Information Bus, managed by the NHS Gloucestershire Clinical Commissioning Group, stocked information booklets and reply-paid cards throughout the period of the Review: however, these were used most frequently during the engagement events (see section 3.4 below);
• all 84 GP surgeries across Gloucestershire were sent information booklets and reply-paid cards to make available to the public. These were addressed to Practice Managers who were asked to display the materials in their waiting rooms, and to contact the Trust should they use their initial stock. In order to increase awareness of the booklets’ availability, the Trust provided graphics for upload to the TV advertising screens sited within 67 GP surgeries: also, information was included in the GP newsletter produced by the NHS Gloucestershire Clinical Commissioning Group;

• Healthwatch Gloucestershire provided much support for the engagement process, and helped by distributing information booklets and reply-paid cards through its established network;

• village and community agents assisted with the circulation of information booklets and reply-paid cards, helping ensure that these reached some particularly “seldom heard, seldom seen” populations including people living in rural and remote areas of the county - village agents in the Forest of Dean were especially active and supportive in this process;

• the Leagues of Friends across Gloucestershire contributed significantly towards raising awareness of the MIIU Review. In particular, there was keen support from Stroud League of Friends who helped circulate information booklets and reply-paid cards: also, Dilke League of Friends, who during August, handed out booklets from the Co-op in Cinderford;

• Forest Route Community Transport requested supplies of information booklets and reply-paid cards so as to be able to distribute amongst their users;

• Two Rivers Housing Association also requested information booklets and reply-paid cards in order to make these available to their client base;

• information booklets and reply-paid cards were distributed via a number of high-profile local community leaders, including those representatives who manage the Friendship Café in Gloucester, which is a focal point for black and minority ethnic populations in the city.

It is also noted that the information booklet was available in alternative languages upon request, although no such requests were received. The booklet was also converted into an EasyRead format (see appendix 2 below), and this was circulated via Inclusion Gloucestershire (formally Gloucestershire Voices and PING, Physical Inclusion Network Gloucestershire) which circulated the information to its membership.
3.2 Online presence

So as to extend the reach of the MIIU Review, the Trust utilised a range of online channels in order to engage more widely with the local Gloucestershire public. These channels included the following:

- the Trust set up a dedicated email address (MIIUReview@glos-care.nhs.uk), which was promoted on the printed information booklet and across all other media and public relations activities, and which served to receive questions and queries relating to the Review;

- the MIIU Review information booklet was made available in electronic form - this was cascaded to all key stakeholders on the day prior to the formal public engagement launch (see section 2.4 above): it was also made accessible via the Trust’s main website;

- the public was also invited to register its choice on the presented options and leave other comments about the MIIU Review using an online survey facility: access to both the survey and information booklet were made easy via a prominent banner on the Trust’s main public website which was maintained as a static promotion throughout the period of the engagement process;

- a short film outlining the rationale behind the Trust’s decision to undertake the MIIU Review was also made available via the organisation’s main public website, where it was viewed 222 times – the film was additionally circulated to stakeholders as a source of further information;

- key stakeholders supported the Trust by cascading the electronic information booklet and the link to the survey to their members, and/or by carrying information about the Review on their own website. These stakeholders included:
  - NHS Gloucestershire Clinical Commissioning Group who forwarded the information electronically to all 84 Patient Participation Groups (PPGs) across Gloucestershire
  - Healthwatch Gloucestershire
  - Gloucestershire Rural Community Council
  - Gloucestershire Hospitals NHS Foundation Trust, who forwarded the information to its members (NB the information was also carried within the Gloucestershire Hospitals Trust’s staff magazine).
3.3 Social media

During the engagement period, the Trust actively used social media in order to further interact and engage with local people and communities. This included the following:

- an extensive Facebook advertising campaign, raising awareness for the MIIU Review and directing people to the Trust’s website in order to register their choice of option and voice their opinions, was run across the seven week engagement.

By 31 August, this campaign had reached 80,966 individual people, having been targeted at people living within a 50 mile radius of Gloucester city centre, and using keywords relating to “hospital”, “injury”, “illness”, “emergency department”, “A&E”, “urgent care” etc to further define the audience.

From this overall reach, 1,573 people had directly engaged with the advertisement in the form of likes, comments, shares, post clicks and views of the logo’s animated GIF (Graphic Interchange Format). This activity would have enabled the reach to grow even further as people shared the link across their own personal networks.

Analytics of this activity show that the Trust’s Facebook campaign was mostly popular with women aged 35+;

- the Trust used Twitter routinely throughout the engagement period, utilising the hashtag #MIIUReview, in order to continuously reinforce awareness of the on-going Review, and more specifically, to remind people about forthcoming public engagement events which they could attend (see section 3.4 below);

- the Trust organised and promoted two Twitter chats within the engagement period, wherein the Trust’s Chief Executive and Chief Operating Officer made themselves available over two 2-hour periods to answer public enquiries.
3.4 Public engagement events

In order to engage effectively with the local public on a more personalised basis, the Trust arranged a series of open events across the county. These were a mix of the following two approaches:

- drop-in events, where on most occasions (but dependent upon numbers), there was a formal presentation followed by a question and answer session;
- information bus events, whereby the public were welcomed onto the bus to collect information, complete a survey if they so wished, and/or enter into discussion with Trust representatives.

The Trust’s Executive Directors including the Chief Executive, Chief Operating Officer, Director of Nursing and/or Medical Director were present at most events, supported by the Trust Chair, as well as the Head of Planning, Compliance and Partnerships, the Head of Community Hospitals, the Community Partnerships and Events Manager and the Community Partnerships and Events Officer.

Events were publicised within the information booklet, and on the Trust website - each was also promoted in the days immediately beforehand using social media and local newspapers.

Table 3: Public engagement events

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<thead>
<tr>
<th>Locality</th>
<th>Venue</th>
<th>Form</th>
<th>Date</th>
<th>Numbers</th>
</tr>
</thead>
<tbody>
<tr>
<td>Forest of Dean</td>
<td>Cinderford High Street, Cinderford GL14 2SH</td>
<td>Information bus</td>
<td>Wednesday 13 July</td>
<td>4</td>
</tr>
<tr>
<td></td>
<td>Lydney Hospital, Lydney GL15 5JE</td>
<td>Friends of Lydney Hospital fete</td>
<td>Saturday 16 July</td>
<td>40</td>
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<td></td>
<td>Lydney Community Centre</td>
<td>Locality Reference Group</td>
<td>Wednesday 20 July</td>
<td>25</td>
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<td></td>
<td>The Main Place, Coleford GL16 8RH</td>
<td>Drop-in</td>
<td>Monday 1 August</td>
<td>3</td>
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<tr>
<td></td>
<td>Coleford Market Place, Coleford GL16 8AA</td>
<td>Information bus</td>
<td>Thursday 18 August</td>
<td>15</td>
</tr>
<tr>
<td></td>
<td>Cinderford High Street, Cinderford GL14 2SH*</td>
<td>Information bus</td>
<td>Thursday 25 August</td>
<td>5</td>
</tr>
</tbody>
</table>

*This event was organised after the information booklet had been printed in response to requests from the Cinderford area for another event
<table>
<thead>
<tr>
<th>Locality</th>
<th>Venue</th>
<th>Form</th>
<th>Date</th>
<th>Numbers</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stroud</td>
<td>Stroud Holy Trinity Church, Trinity Road, Stroud GL5 2HX</td>
<td>Drop in</td>
<td>Thursday 28 July</td>
<td>12</td>
</tr>
<tr>
<td></td>
<td>Stroud Holy Trinity Church, Trinity Road, Stroud GL5 2HX</td>
<td>Drop in</td>
<td>Tuesday 2 August</td>
<td>4</td>
</tr>
<tr>
<td></td>
<td>Outside Post Office, Silver Street, Dursley GL11 4BN</td>
<td>Information bus</td>
<td>Thursday 4 August</td>
<td>11</td>
</tr>
<tr>
<td></td>
<td>11 King Street, Stroud GL5 3BX</td>
<td>Information bus</td>
<td>Monday 22 August</td>
<td>15</td>
</tr>
<tr>
<td>Cirencester</td>
<td>Corinium Museum, Park Street, Cirencester GL7 2BX</td>
<td>Drop in</td>
<td>Wednesday 27 July</td>
<td>4</td>
</tr>
<tr>
<td></td>
<td>Corinium Museum, Park Street, Cirencester GL7 2BX</td>
<td>Drop in</td>
<td>Tuesday 9 August</td>
<td>6</td>
</tr>
<tr>
<td></td>
<td>Cirencester Hospital, Tetbury Road, Cirencester GL7 1UY</td>
<td>Information bus</td>
<td>Friday 26 August</td>
<td>4</td>
</tr>
<tr>
<td>Gloucester</td>
<td>Southgate Street, Gloucester GL1 2DH</td>
<td>Information bus</td>
<td>Monday 18 July</td>
<td>3</td>
</tr>
<tr>
<td></td>
<td>Friendship Café, Gloucester GL4 6PR</td>
<td>Drop-in</td>
<td>Thursday 18 August</td>
<td>2</td>
</tr>
<tr>
<td>Cheltenham</td>
<td>173 High Street, Cheltenham GL50 1DF</td>
<td>Information bus</td>
<td>Friday 19 August</td>
<td>3</td>
</tr>
<tr>
<td>North Cotswolds</td>
<td>The Square, Stow-on-the-Wold GL54 1AB</td>
<td>Information bus</td>
<td>Monday 8 August</td>
<td>14</td>
</tr>
<tr>
<td>Tewkesbury</td>
<td>Spring Gardens, Oldbury Road, Tewkesbury GL20 5DN</td>
<td>Information bus</td>
<td>Friday 5 August</td>
<td>5</td>
</tr>
</tbody>
</table>
In addition to the above open public events, key stakeholders were also invited to attend a number of “closed” sessions to enable discussions between the Trust’s senior representatives and key partners (see section 2.4 above).

These sessions were as follows:

Table 4: Stakeholder engagement events

<table>
<thead>
<tr>
<th>Locality</th>
<th>Venue</th>
<th>Form</th>
<th>Date</th>
<th>Numbers</th>
</tr>
</thead>
<tbody>
<tr>
<td>Forest of Dean</td>
<td>The Main Place, Old Station Way, Coleford GL16 8RH</td>
<td>Drop-in</td>
<td>Monday 1 August</td>
<td>12</td>
</tr>
<tr>
<td>Stroud</td>
<td>Stroud Holy Trinity Church, Trinity Road, Stroud GL5 2HX</td>
<td>Drop in</td>
<td>Thursday 28 July</td>
<td>2</td>
</tr>
<tr>
<td>Cirencester</td>
<td>Corinium Museum, Park Street, Cirencester GL7 2BX</td>
<td>Drop in</td>
<td>Wednesday 27 July</td>
<td>6</td>
</tr>
</tbody>
</table>

The discussions at both the public and stakeholder engagement events will be used to inform the MIIU Proposal Paper that will be going to the Trust Board on 20 September.

*NB The Trust’s learning from these events, which it will use in future engagement exercises, is to increase the number of weekend events and add some evening sessions: however, in the original planning, the Trust felt that there were a sufficient number of alternative channels available to local people other than these face-to-face discussions. However, a number of requests from the public has since led the Trust to re-evaluate this decision.*
3.5 **Staff engagement**

In order to ensure that the Trust’s workforce was specifically able to hear about, and respond to, the MIIU Review, the organisation undertook the following actions:

- on 12 July, senior clinical staff representing each of the seven MIIUs attended the MIIU Governance Forum, at which they were given full and open details regarding the Review and engagement process, so that they could subsequently share this information with their locality colleagues. This forum was attended by nine members of staff;

- also on 12 July, a global email was sent to all colleagues across the Trust so as to alert them to the engagement, and to provide them with a direct link to the Trust’s website where they could access further information and complete the survey;

- from 13 July to 31 August, eight foot banners, together with the information booklets and reply-paid cards, were prominently displayed in each of the Trust’s community hospitals / MIIUs, thereby raising the visibility of the Review with staff, as well as the public;

- also from 13 July until 31 August, the MIIU Review was prominently highlighted on the main banner of the Trust’s internal intranet site, directing all colleagues to the public website so that they could read more about the Review and complete the survey;

- similarly, throughout the entire period of the engagement, updates regarding the MIIU Review were routinely included within the Trust’s weekly CORE newsletter, sent by global email to all colleagues across the organisation, again enabling staff to directly access information and the survey;

- on 28 July, senior management colleagues from all areas of the Trust were given a presentation about the Review as part of the Trust’s routine CORE Network meeting: this was followed by a Question and Answer session. The event was attended by 48 colleagues;

- the Trust also utilised the Trust’s communications network to send text messages to all staff with mobile telephones, reminding them about the Review and how information could be accessed;
• in addition to the above activities, staff were also invited to attend one of the eight engagement events that were held across the county, detailed in Table 5 below. These events were hosted by Trust Executive Directors, and gave colleagues the opportunity to ask more detailed questions about the Review and engagement process.

Table 5: Staff engagement events

<table>
<thead>
<tr>
<th>Locality</th>
<th>Venue</th>
<th>Date</th>
<th>Attendance numbers</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cotswolds</td>
<td>North Cotswolds</td>
<td>Monday 25 July</td>
<td>2</td>
</tr>
<tr>
<td></td>
<td>Hospital</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cirencester</td>
<td>Cirencester</td>
<td>Wednesday 27 July</td>
<td>3</td>
</tr>
<tr>
<td></td>
<td>Hospital</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Gloucester</td>
<td>Dowty’s Sports</td>
<td>Friday 29 July</td>
<td>2</td>
</tr>
<tr>
<td></td>
<td>Club</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Stroud</td>
<td>Stroud Hospital</td>
<td>Tuesday 2 August</td>
<td>9</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Vale Hospital</td>
<td>Thursday 4 August</td>
<td>1</td>
</tr>
<tr>
<td>Forest of Dean</td>
<td>Dilke Hospital</td>
<td>Friday 12 August</td>
<td>2</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Lydney Hospital</td>
<td>Monday 15 August</td>
<td>2</td>
</tr>
<tr>
<td>Tewkesbury</td>
<td>Tewkesbury Hospital</td>
<td>Friday 19 August</td>
<td>0</td>
</tr>
</tbody>
</table>
4. **Detailed feedback**

4.1 **Feedback from key stakeholders**

In response to the MIIU Review, a number of the Trust’s key stakeholders chose to submit formal response. Others made a conscious and public decision not to respond as a whole, but rather to elicit their supporters / members to submit their individual responses either via the online survey or using the Freepost reply-paid card.

The formal responses to the MIIU Review which are reprinted below, were received from:

4.1.1 NHS Gloucestershire Clinical Commissioning Group

4.1.2 Gloucestershire Hospitals NHS Foundation Trust

4.1.3 Healthwatch Gloucestershire

4.1.4 Stroud Town Council

4.1.5 Cotswolds District Council

4.1.6 Forest of Dean Locality Executive Group (LEG), which comprises local GPs

4.1.7 Stroud Locality Executive Group (LEG), which comprises local GPs

4.1.8 Friends of Lydney Hospital

4.1.9 Stroud League of Friends

4.1.10 Stroud Against The Cuts
4.1.1 **NHS Gloucestershire Clinical Commissioning Group**

Gloucestershire Clinical Commissioning Group (CCG) would like to take this opportunity to acknowledge formally the recent engagement activity organised and undertaken by Gloucestershire Care Services NHS Trust (GCS) with regards to three options for changing the operating hours of the Minor Injuries and Illness Units (MIIUs) managed by GCS. Opportunities for face-to-face engagement and feedback have been facilitated by GCS across the county, as well as online and social media platforms.

We note that the engagement period concludes today, 31 August 2016. We very much look forward to discussing with you at the earliest opportunity, the feedback you have received from the public, local community partners and your staff, and considering how the feedback received will influence and inform the Trust’s decision making processes.

We will be in touch with you in due course to discuss further your business case and staffing proposals, which we need to consider as a separate matter following any decision regarding future MIIU opening times.
4.1.2 Gloucestershire Hospitals NHS Foundation Trust

Thank you for the opportunity to comment on the options for the opening hours of your Minor Injuries and Illness Units, as part of your public engagement process. What follows represents the response from the Gloucestershire Hospitals NHSFT, informed by discussions with our Board, governors and senior leadership team.

On the narrow question that forms the basis of the engagement process, our preferred option is option 1, change the opening hours of all minor injuries units to 8.00am to 8.00pm.

The reasons for this preference are:

- we recognise and share the challenges of nurse recruitment;
- we accept that appropriately staffing these units overnight does not represent value for money; and
- that a consistent pattern of opening hours across the minor injuries department will help us to develop unambiguous and clearer messaging for the public.

Based on the audit of their current usage, it should be possible for this option to be implemented without significantly impacting on the system’s ability to meet the national target to see 95% of people in an emergency department within four hours. However, we believe that this will need the system to work in partnership to design a more integrated emergency care model which maximises the contribution made by the minor injuries units during these revised opening hours.

We remain unconvinced that the resources released from implementing this option and the proposed additional investment of between £210k and £460k, represents value for money, and we would be very willing to explore with you and partners whether there are alternative system-wide models which would deliver a better return on our investment.
4.1.3 Healthwatch Gloucestershire

Over a 25 day period in August, Healthwatch Gloucestershire (HWG) asked its members and the public via e-alert, newsletter, social media and GCS leaflets, what they thought of the proposed revised opening hours at the county’s MIIUs.

Whilst many had responded directly to GCS, HWG received the following responses as shown below:

- Option two seems the most equitable given underlying circumstances. Closure for Cirencester at 8.00pm is unwise and unacceptable to local residents as a lot can happen of a minor emergency nature during the evening.

- This does not seem a fair choice - we were told that this Government wanted a 7 day a week health service, yet this is a clear cut to local services. Stroud General Hospital should be open 24 hours. I object to any cut, but clearly prefer option 2 to option 1. I consider this cut will lead to more people needing ambulances.
4.1.4 Stroud Town Council

With reference to your consultation relating to the MIIU at Stroud General Hospital, the Town Council objects to the proposals to reduce the opening hours at the unit. The Council is concerned about the impact on local residents who will not be able to access the care they need and, also the impact on provision at A&E departments at other local hospitals that are already overstretched.

The Council also objects to the format of the consultation which is in effect a fait accompli, because there is no option for residents to express a preference for the unit to remain open all night.

In the absence of an option to retain the status quo it would be dishonest to regard the result as a vote of support for reducing the opening hours.
4.1.5 Cotswolds District Council

Thank you for engaging us in the review of Gloucestershire’s Minor Injury Units. It has been valuable to have had three public consultation events in the district. We visited the session at the Corinium Museum in Cirencester. We hope that these occasions have informed you about which Options are being supported.

Cotswold District Council understands that whilst the review involves our two Community Hospitals, the argument to close Units overnight concerns only Cirencester Hospital. The North Cotswolds Hospital already closes at 8pm. There has been public reaction to the proposal to close the MIU overnight in Cirencester resulting in a Petition which has gathered over a thousand signatures so far.

We note that the Review has been prompted by the CQC visit to the county. This visit highlighted the need for a safe and appropriate spread of trained staff in the Units. This has made you look at the numbers of patients seen overnight and they are small compared to the day attendance. We can understand that in order to use staff more efficiently, the transfer of experienced nurses to day duty is a logical one - given the national recruitment issue at the moment. You make it clear that it is not a cost cutting exercise when you are putting extra investment into the system. If this leads to a reduction in agency staff being employed, then that can only be a good thing in terms of maintaining a team approach. Nurses working in a casualty situation require special skills, and these skills can be lost by staff operating overnight with so few cases.

Educating the public is essential for directing potential patients to appropriate Units. We understand that there is a free APP which gives advice of where to go and when for a range of conditions. We could assist in ‘marketing’ this via our website and support you in your efforts to communicate service changes to residents after your decision is made in September. Our district is very rural, and there are different issues in the north compared to the south. Any communications would have to cover the whole patch.

It is clear to us that the Review has elicited an emotive response from the public in Cirencester. The history of the hospital is a long one, and we feel the public sees the current proposal as another nail in the coffin. When the doctors left the Unit, it was seen as a real downgrade. We understand that the reality is that you cannot provide all the technical/diagnostic facilities in every Unit. The point must be made
strongly that the Hospital is not under threat but that it will be operating in a safer and more sustainable way whilst still providing the majority of services. Dr Roberts did a survey of who was attending – most patients could have been seen the next day and more complex cases should have gone to GRH anyway. Again this requires education and we offer to help with this in any way you think appropriate.

Our conclusion is that given the size of Cirencester - 20,000 population - and the evening economy, the best option is to keep the Unit open to 11pm. It can be seen as a compromise on your behalf to the concerns of the public as indicated in the Petition. We feel sure that there is the need for a service to run to 11pm for minor injuries and accidents, and have no doubt that your figures would bear this out.

We therefore support Option 2 and hope that this fits in with your Board's decision.
4.1.6 Forest of Dean Locality Executive Group (LEG)

The Forest Locality discussed the proposals outlined by GCS at our LEG meeting yesterday. The view of the Forest locality is that Option 2 is the best option.

We have come to this decision as we feel it is completely the wrong time to make changes with the community hospital review going on. Any changes now we feel would seriously undermine public trust in the process and make any recommendations of the review difficult to implement in the future.

The locality are concerned that the one public engagement event for Cinderford was 1 day after the announcement and the same day it went into local media. We would ask GCS to look at offering a further event to give people notice to be able to attend.

The Forest locality is working hard on a joined-up patient-centred approach to urgent care and a community hospital review which is sustainable for the future.
4.1.7 Stroud Locality Executive Group (LEG)

We have just discussed MIUs at our Stroud Locality Executive. We see the economic sense in closing at night. We would urge you at least to look at being open 8-24.00 in Stroud and 8 to 8 in The Vale.

Our only other comment is that we feel in our area, MIU could become urgent care hubs, supported by hospital beds for temporary assessment admissions, and we would love to work together with GCS in the spirit of MCPs to really develop local services. We would ask that GCS does not get focussed on organisational profit, but works with us to make care better closer to home. We are all after the same thing, providing excellent local services at a low as possible cost, so if you can give assurances that some charging regimes can be modified to help patients, then I’m sure we could really make community hospitals thrive locally.

As we are a pilot site, I wonder whether you want to discuss working closer with GPs and out-of-hours organisations locally and try and work with choice plus as well as Gloucestershire Hospitals Trust to boost urgent care available locally.
4.1.8 Friends of Lydney Hospital

I confirm the view that the Friends of Lydney Hospital wish to retain the existing opening hours for the MIIU at both locations in the Forest (Option 2), but in the event that this is not possible, then we would prefer there to be a standard opening hours regime throughout the county (Option 1).

We do not support Option 3 as we believe that this would cause confusion in the population at large and would result in much media comment about the roles of the two Forest community hospitals at a time when there is a much wider consultation taking place over service provision in the locality.
4.1.9 Stroud League of Friends

Trustees of the League of Friends have met and considered the recently published review document. We feel strongly that the Minor Injury and Illness Service at Stroud General Hospital should continue as a 24 hour service because this presents a very high level of service and care for our local people, with a population of 119,583. This population figure taken from the CCG Annual Review is significantly higher than the populations of all the other Gloucestershire Community Hospitals and approaches the populations of Gloucester 169,681 and Cheltenham 152,503.

Trustees are however aware that from 12 midnight to 8am, the Unit is very quiet, you have difficulty recruiting suitably qualified staff, and the cost of maintaining the required Care Quality Commission staffing ratio is very costly.

In the absence of a 24 hour option, my trustees have no alternative other than to select Option 2 as our preferred option which would mean that Stroud and Cirencester MIIUs would provide their fine service from 8am until 11pm, seven days each week.

We would like you to flex slightly the closing time to 12 midnight for two reasons:

- more people use the MIIU between 11pm and midnight than in the early hours, and with good publicity this extra hour could relieve pressure on the extremely busy Gloucester and Cheltenham Accident and Emergency Departments;

- an evening opening time until 12 midnight fits in with the developing preferred preference of the Gloucestershire Clinical Commissioning Group to have Urgent Care Hubs open for 16 hours daily.

We are of the strong opinion that the decision you are making about closure hours should be deferred until the results of the ongoing Gloucestershire Urgent Care Review are known, as we believe this will be established by the end of October, and the current proposals for closing times are an interim measure until this time. There are significant problems associated with the retendering of the out-of-hours service, and the need to relieve waiting times at Gloucestershire Royal and Cheltenham Hospital A&E which need to be addressed as part of a planned approach. My trustees do not subscribe to the suggestion that a uniform offering allows everyone to know the opening times of Gloucestershire MIIUs. People in the Stroud District would need to
know the opening hours of their MIIU, likewise other areas need to know their own opening hours. This will require a public information exercise which could also include the scope of MIIUs in managing minor illness and injury. This should increase usage of the Gloucestershire MIIUs.

Members of the League of Friends are very pleased to be working with your Estates Manager and our Matron to refurbish and develop the excellent MIIU we have in Stroud. We are hoping that this development will encapsulate the developing plans for urgent care in Gloucestershire.

Ideally in the best interest of patients, we would see our present MIIU developing into a 24 hour Urgent Care Centre serving the large population of Stroud and Berkeley Vale. This would receive significant League of Friends and community support. We are happy to take part in any discussions to explore the service provision of this very important service.
4.1.10 Stroud Against The Cuts

We have been troubled by the recent sporadic overnight closures of Stroud (and Cirencester) MIIU, and are not reassured by statements in the booklet that the proposed changes in opening hours are related to a “lack of available staff”, and “attendances between 11pm and 8am [being] comparatively few”. We would like to express our strong disappointment that 24 hour opening is not an option for Stroud or Cirencester. We do not believe you have public support for removing services unless you have shown how other local services will fill the gap, or at least until you have explained in detail what impact of a reduction in opening hours you expect on the emerging chaos and crisis in urgent care in Gloucestershire, and what steps have been taken to mitigate this.

As such, we would like clarity regarding the impact of these changes on other local healthcare services. The booklet states that “this review does recognise that by reducing access to MIIUs, there may be some additional minor pressure upon other parts of the urgent care system: this impact has already been discussed with the Trust’s partners”. We believe it is essential that the outcome of these discussions is public. Specifically, we ask: what have Gloucestershire Care Services and the Gloucestershire Clinical Commissioning Group done to assess the impact of changes to MIIU opening hours on Out Of Hours and urgent care services in Stroud and Gloucestershire?

We note that local Out of Hours provision is already in turmoil, with the service having been closed for 560 hours at The Dilke, and 195 hours here in Stroud in a single year, and South West Ambulance Service Foundation Trust say they “do not believe we can continue to offer this service effectively, and within the current contractual constraints, the trust does not have the resources to improve the service to a level that is satisfactory for ourselves, patients or commissioners” (“Patients faced with closures of out-of-hours GP services”, Gloucestershire Live, May 21st 2016). We further note that the relatively recent downgrading of Cheltenham A&E has predictably contributed to a worsening situation with regard to Gloucestershire Hospitals NHS Trust meeting its target to treat 95% of Accident & Emergency (A&E) patients within four hours, which has been missed every month for a year.

We believe there was a rationale for the Stroud and Cirencester service being open 24 hours in the past, or this would not be the situation prior to this review. Our position is that 24 hour opening is important to ensure universal provision that can catch occasional need and that it...
further provides important reassurance for the local population that care is available nearby if needed. It is clear to us that GCS itself felt 24 hour opening at Stroud was important when opening hours at the Vale Hospital were reduced in 2014, as Susan Field (then Director of Service Transformation) publicly stated at the time that this change was partly about “enabling us to keep the MIU service at Stroud General Hospital running 24 hours a day.” (“Changes to opening times for Minor Injuries Unit at Vale Community Hospital, Dursley”, Gloucestershire Live, 2nd April 2014). We would appreciate further detail on attendances over this time period and ask for data on full year attendances at Stroud, Cirencester, Lydney and the Dilke as individual MIUs annually from 2010 to 2015.

We support the sentiment behind David Miller, Chairman of Stroud Hospital League of Friends, endorsement of Option 2 in your review, which would keep Stroud and Cirencester MIUs open for the longest possible hours with least impact on other units, but also his comment in a letter to the Stroud New and Journal: “Ideally we would like to continue opening for 24 hours but if this is unacceptable then at least until midnight.” While we have been encouraging people to sign local petitions to make clear the level or desire for 24 hour opening and support for MIUs, we understand that this has not been included as an option for a reason. Our desire is to make clear our opposition to the erosion of NHS services locally. We note that at time of writing 2,325 people have signed Liberal Democrat County Councillor for Cirencester Cllr Joe Harris’ petition to “Keep Cirencester Hospital open overnight”, and 700 people have signed the Labour Party petition online to “Ensure 24 hour, urgent care is provided at the Minor Injuries Unit at Stroud Hospital” – with around 1,000 more signing the same petition in paper form. Regardless of the reasons and the justification for them, we see these changes in opening hours as a cuts that undermine the NHS principles of universal, comprehensive, easy to access care – and as such we wish to convey our clear opposition to them. We do not wish to endorse options which involve a reduction in opening hours, nor can we support an outcome which preserves Stroud’s MIU at the expense of services in other parts of the county. We wish to communicate our concern that people be expected to travel greater distances, which is expensive at best and out of reach to many who are unable to drive, or to afford taxi fares. We are troubled by the way in which GCS treats increased travel distances by suggesting that because “the two sites [in the Forest of Dean] are less than 9 miles apart”, “there is sufficient capacity to handle demand in just one of the MIUs”, particularly given the difficulties SWASFT is having in meeting Ambulance response time
targets (“More ambulances for Gloucestershire after fallen pensioner, 72, waits 90 minutes after 999 call”, Gloucestershire Echo, 9th June 2016, and “‘Failing’ ambulance response times in Gloucestershire raise serious concerns for county council”, Stroud News and Journal, 7th December 2015), and poor performance of the Non-Emergency Ambulance Service (“Hundreds of complaints after company fails to get patients to appointments on time”, Gloucestershire Live, 6th March 2015).

We hope our desire for the longest possible opening hours across all MIIUs is clear, despite 24 hour opening apparently no longer being possible. Nonetheless, we wish to emphasise our understanding of the importance of appropriate numbers of sufficiently qualified and competent staff. In Stroud Against the Cuts, we have supported the 4:1 campaign that seeks mandatory minimum staffing ratios (4to1.org.uk), and joined Sir Robert Francis in criticising the decision to halt work into safe staffing by the National Institute for Health and Care Excellence (“Francis criticises cessation of NICE work on safe staffing guidance”, 5th June 2015). We appreciate that “qualified nurses and especially Emergency Nurse Practitioners are in short supply nationwide”, but would request that GCS and GCCG make public statements regarding their understanding of the causes of this shortage and policies that can either contribute to help or hinder it in future. We note that, according to the Royal College of Nursing, pay has fallen by at least 14% in real terms thanks to the government’s public sector pay freeze. RCN Chief Executive, Janet Davies, says the current shortage of nurses was “a preventable crisis, caused by years of cuts to student nurse commissions and a lack of long-term workforce planning. It could be worsened by the Government’s untested gamble with student nurse funding, which our members are clear will have a negative impact on the future supply of graduate nurses” (“The RCN's fight for fair pay will continue as UK governments award inadequate pay uplift”, Royal College of Nursing, 8th March 2016). We believe that GCS and GCCG should make a clear statement that they oppose the changes to student nurse funding, and the imposition of contracts on healthcare workers outside of collective bargaining in general and specifically with regard to the current junior doctors’ contract – both policies which threaten to exacerbate staffing problems.

We would also like to know precise numbers regarding how many nurses have responded to recruitment offers by GCS in recent years, how many have been interviewed, and how many recruited?
The Gloucestershire Care Services booklet accompanying the review states that the proposals “are not about cost-cutting, as each option requires additional investment of between £210,000 and £460,000”. We would like to ask what period this additional investment applies to – is it annually or over a longer period? How does it relate to the existing budget for the MIIUs in Gloucestershire, and their budget in real terms over the past decade? Most importantly, we would like to ask about the future budget for Gloucestershire Care Services and encourage the Trust to state publicly any concerns about planned funding and demands for ‘efficiency savings’ over the next 5 years. In Stroud Against the Cuts, we fear for the future of local NHS services under the latest round of reorganisation and demand that Gloucestershire’s ‘Sustainability and Transformation Plan’ is made public as soon as possible, and GCS communicate swiftly any additional potential changes to either MIIU provision in the county or services at Stroud Hospital.

Finally, we note with disappointment that all the engagement events organised by Gloucestershire Care Services in Stroud have taken place during working hours and in the week, that they occurred with short notice, and that there was no advertising outside Trinity Church either before or indeed during the previous events. **We would like to know how many people in total have attended these events as we believe it to be little more than a handful.**

In summary, we would like responses to the following queries. Please treat these as Freedom of Information requests if necessary:

1. **a) What has Gloucestershire Care Services done to assess the impact of changes to MIIU opening hours on Out of Hours and urgent care services in Stroud and Gloucestershire?**

2. **b) What has Gloucestershire Clinical Commissioning Group done to ensure a full impact assessment of changes to MIIU opening hours on Out of Hours and urgent care services in Stroud and Gloucestershire has been undertaken?**

3. **Please provide further details on numbers attending the county’s MIIUs from 2010 – 2015, broken down for Stroud, Cirencester, Lydney and the Dilke, by hour.**
3. Please provide precise numbers regarding how many nurses have responded to recruitment offers by GCS in recent years, how many have been interviewed, and how many recruited?

4. What period does the “additional investment of between £210,000 and £460,000” cover? Is it annually or over a longer period? How does it relate to the existing budget for the MIIUs in Gloucestershire, and their budget in real terms over the past decade?

5. Please inform us of how many people in total have attended the engagement events in Stroud.

We also restate the following requests:

1. Please make public statements regarding GCS and GCCGs understanding of the causes of the MIIU staffing shortage and national policies that can either contribute to help or hinder it in future.

2. Please make a clear statement of opposition to the changes to student nurse funding, and the imposition of contracts on healthcare workers outside of collective bargaining in general and specifically with regard to the current junior doctors’ contract.

3. a) Please could you state publicly any concerns about planned funding and demands for ‘efficiency savings’ over the next 5 years?

    b) Please make public Gloucestershire’s ‘Sustainability and Transformation Plan, or any aspects of it that relate to Gloucestershire Care Services.
4.2 **Other community feedback**

In addition to the formal feedback noted in section 4.1 above, the Trust also became aware during its engagement practices of two community-based petitions against the proposed changes. These were:

- a petition against the closure of the overnight service at Cirencester MIIU organised by Cllr Joe Harris, the Liberal Democrat Councillor for Cirencester Park on Gloucestershire County Council, and for St Michael's Ward on Cotswold District Council and Cirencester Town Council. At the time that the MIIU Review closed (midnight, 31 August 2016), there were a recorded 2,399 signatures on this petition, which was run directly through Cllr Joe Harris’ website;

- a petition against the closure of the overnight service at Stroud MIIU organised by Debbie Hicks, Vice Chair of the Stroud Constituency Labour Party. At the time that the MIIU Review closed (midnight, 31 August 2016), there were a recorded 854 signatures on this petition, which was run through the Change.org website.

The Trust was open to both of these petitions, and welcomed comments. Indeed, Cllr Joe Harris was scheduled to attend the closed stakeholder event in Cirencester (see Table 4 above) but had to withdraw due to competing priorities - similarly, the Trust’s Chief Executive offered to meet Debbie Hicks to receive the petition at the Trust’s headquarters, but Ms Hicks subsequently cancelled the appointment. However, all comments which were posted on the respective websites were read by the Trust’s Chief Operating Officer on a daily basis in order to inform the MIIU Proposal Paper which will be presented to the Trust Board on 20 September 2016.

In addition to the above two petitions (for which there were also a number of rallies throughout the engagement process), there were also a number of other groups who coordinated to voice their concerns. These included Stroud Against the Cuts who campaigned to "challenge the MIIU changes across the county but also to highlight the crisis the government is causing in the NHS". Representatives from Stroud Against the Cuts attended both of the public stakeholder events held in Stroud, where they engaged in constructive dialogue with senior members of the Trust Board.
5. Feedback to the options

5.1 Analysis of respondents

In total, there were 1,170 individual responses to the Trust’s MIIU Review (NB these do not include the organisational responses detailed in section 4 above).

Responses were received via the online survey, or the Freepost reply-paid card or by any other means (predominantly, the dedicated email address or by telephone).

Chart 1 below shows the proportion of response methods used.

*Chart 1: Methods of response*
The age range of respondents to the MIIU Review was as shown in Chart 2 below.

Chart 2: All respondents, categorised by age range

It is noted that proportionally, the age profile of those people who responded to the MIIU Review was considerably older than the Gloucestershire average.
The home locations of the respondents to the MIIU Review were as shown in Chart 3 below:

Chart 3: All respondents, categorised by home location

Not unsurprisingly, there was lower response from people living in those areas of the county where no change was proposed. However, of the remaining localities, there was a significantly higher response rate from people living in the Forest of Dean (reflected also in the number of comments received - see Appendix 1 below).
5.3 **Options appraisal**

The percentage of votes received for the three options was as follows:

*Chart 4: Response rates per option*

For ease of reference, the options were:

- **Option 1**: To change the opening hours of all seven Gloucestershire MIIUs to 8am-8pm

- **Option 2**: To change the opening hours of the MIIUs in Cirencester and Stroud to 8am-11pm

- **Option 3**: To change the opening hours of the MIIUs in Cirencester and Stroud to 8am-11pm, and also the opening hours of one of the MIIUs in the Forest of Dean (either Lydney or the Dilke) to 8am-8pm

**NB As per the legal advice detailed in section 2.2 above, the outcome of this survey does not automatically determine the option which will ultimately be implemented by the Trust: however, the votes received and the comments detailed in Appendix 1 below, will most certainly serve to inform and influence the Trust’s decision.**
Below is a breakdown of response to the different options by age range, in order to identify any salient trends:

*Chart 5: Proportion of favoured options by age range*

Although there were significantly fewer responses from people in the lower age ranges as demonstrated in Chart 2 above, it would appear that respondents aged under 34 years have a greater appetite for change, as proportionally, higher numbers voted for option 1. Conversely, people in the older age ranges expressed desire for less change, and therefore were more supportive of option 2 which would result in less impact countywide.
Below is a breakdown of response to the different options by people from different localities, in order to identify any salient differences:

*Chart 6: Proportion of favoured options by home location*

Residents in both the Forest of Dean, and Cirencester in particular, were proportionally more opposed to option 1 which would affect a greater number of MIIUs countywide. Interestingly however, Forest of Dean residents were split in their favour of option 2 which would have no impact upon that locality, and option 3 which would mean one of the Forest MIIUs closing at 8pm. People in Cirencester were proportionally much more likely not to record a preferred option, calling for no change to their local MIIU.