

DEPARTMENT OF HEALTH, SOCIAL SERVICES & PUBLIC SAFETY

The Future of Pathology Services
in
Northern Ireland

CONSULTATION RESPONSE DOCUMENT

November 2006

CONSULTATION RESPONSE QUESTIONNAIRE

You can respond to the consultation document by e-mail, letter or fax.

Before you submit your response, please read the section in the Executive Summary on the confidentiality of the consultation responses. This gives guidance on the legal position about any information given by you in response to this consultation.

Responses should be sent to:

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Responses must be received no later than **28 February 2007**.

I am responding: as an individual on behalf of an organisation

(please tick a box)

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Management and corporate governance

Q1. Do you agree with **recommendation 1**, development of a single, managed pathology network? If not, please state the reasons why.

Yes No

Response:

The Southern Health & Social Services Council supports the development of a single, Managed Pathology Network. However, the structure of the network must ensure that the needs of all communities within Northern Ireland are met and needs to be viewed within the context of the future of other services eg major trauma services. Services in border regions need to be considered in relation to links with the Republic of Ireland. A strategic view should be taken on the development of potential cross border services. This is particularly important to the SHSSC as these considerations may impact on Daisy Hill Hospital's future role in pathology services by enhancing its role and providing it with a wider catchment.

Q2. Do you agree with **recommendation 2**, establishment of a working group to explore formalising links between the proposed pathology network and the Northern Ireland Blood Transfusion Service? If not, please state the reasons why.

Yes No

Response:

Workforce

Q3. Do you agree with **recommendations 3 and 4**, that the DHSSPS workforce plans in relation to (a) consultant pathologists and (b) Technical and Scientific staff should be reconsidered in light of any new reconfiguration of services? Do you agree that future requirements for administrative and clerical staffing should also be examined as part of the process? If not, please state the reasons why.

Yes No

Response:

The Southern Health & Social Services Council accepts that workforce planning needs to be done on a strategic basis that will offer a sustainable service. However, we are concerned by the proposal to not maintain 24 hour cover at Daisy Hill Hospital as this may impact adversely on career development and advance opportunities. A reconfigured pathology should ensure a vibrant career path for skilled and committed staff.

Q4. Do you agree with **recommendation 5**, that the current voluntary arrangements for the provision of out-of-hours services should be replaced by more sustainable and appropriate arrangements by 2008? Do you consider the target date appropriate? If not, please state the reasons why.

Yes No

Response:

Sustainable out of hours services are important. Areas such as Newry and Mourne, currently served by Daisy Hill Hospital, require a quality and sustainable 24 hour service. We believe that this is currently available at DHH.

Q5. Do you agree with **recommendation 6**, that DHSSPS and Queen's University should consider joint initiatives to strengthen academic pathology? If not, please state the reasons why.

Yes No

Response:

Clinical and advisory services

Q6. Do you agree with **recommendation 7**, that the proposed pathology network should ensure that all clinical needs are met in all health and social care settings, irrespective of their distance from the nearest laboratory? If not, please state the reasons why.

Yes No

Response:

The Network will have a role in assessing need and ensuring that it is met. However, geographical distance to the nearest laboratory is potentially a patient safety issue, particularly in emergencies that occur at 'off peak' times. We raise this particularly in relation to Daisy Hill Hospital and communities living in the Newry & Mourne area.

Clinical governance, audit, accreditation and benchmarking

Q7. Do you support **recommendations 8** (audit and clinical governance), **9** (CPA accreditation) **and 10** (benchmarking) as a means of further improving quality, effectiveness and responsiveness in pathology services? Do you consider the target date for enrolment in the CPA accreditation scheme appropriate? If not, please state the reasons why.

Yes No

Response:

Resources

Q8. Do you agree with **recommendation 11**, that the resources currently allocated for pathology services be retained and re-invested across an integrated pathology network? If not, please state the reasons why.

Yes No

Response:

The SHSSC believes that this should not be a cost cutting exercise. The principles of patient safety and equitable access are important should inform the cost effective use of resources.

Technological capacity and equipment replacement

Q9. Do you support **recommendations 12** (regional procurement and maintenance in relation to new and replacement laboratory equipment) **and 13** (considering buying services from the private sector or universities when expensive, infrequently-used equipment is required). If not, please state the reasons why.

Yes No

Response:

Point of Care Testing

Q10. Do you agree with **recommendation 14**, that Point of Care Testing (POCT) should be managed under a regional framework? If not, please state the reasons why.

Yes No

Response:

ICT

Q11. Do you agree with **recommendation 15**, that work on a regional pathology ICT system should be progressed with a view to commissioning a new system by the end of 2009? Do you consider the target date appropriate? If not, please state the reasons why.

Yes No

Response:

Sample Transportation

Q12. Do you agree with **recommendation 16**, that sample transport and management should be reviewed? If not, please state the reasons why.

Yes No

Response:

We believe that the aim should be to minimise sample transportation with the aim of keeping testing as locally accessible as possible.

Future Configuration of Laboratory Services

Q13. Do you agree with **recommendation 17**, that regional pathology services should remain in Belfast and be managed by the new pathology network? If not, please state the reasons why. Where should they be located and who should manage them?

Yes No

Response:

Q14. Do you agree with **recommendation 18**, that laboratory services in Belfast should be provided from a single facility on a 24-hour daily basis, with the development of essential diagnostic facilities to support specific clinical needs at other Belfast locations? If not, please state the reasons why.

Yes No

Response:

We would be concerned that one regional laboratory would be swamped and unable to deal with the volume of work efficiently.

Q15. Do you agree with the proposals in **recommendation 19** for pathology services at the large acute hospitals (Altnagelvin, Antrim, Craigavon and the Ulster), that:

- integrated clinical biochemistry and haematology should be provided on a 24-hour basis at all four hospitals
- microbiology should be provided on a 24-hour basis at Altnagelvin and a 12-hour basis at the other three hospitals
- histopathology and cytopathology services should be provided from the Belfast facility (recommendation 18 refers), with small facilities at the large hospitals for urgent diagnostic work, and a permanent consultant pathologist team at Altnagelvin?

If not, please state the reasons why.

Yes No

Response:

We believe that issues of patient safety are paramount here. We also believe that the volume of work and the pressure to make results available speedily make this option unviable.

Q16. Do you agree with the proposals in **recommendation 20** for pathology services in the smaller acute hospitals (Causeway, Daisy Hill and the new South West hospitals), that integrated clinical biochemistry and haematology should be provided on a 12-hour basis and all out of hours urgent samples transferred to the nearest large acute hospital laboratory? If not, please state the reasons why.

Yes No

Response:

The Southern Health & Social Services Council is concerned that the provision of services at Daisy Hill Hospital on a 12 hour basis will impact adversely on patient safety. The distance between Daisy Hill Hospital and Craigavon Area Hospital would mean considerable delay in receiving the results of out of hours tests. In particular, the treatment of some groups such as attempted suicide is potentially more likely to happen out of hours.

In addition, Daisy Hill Hospital has the potential to act as a cross border provider. A broader view of need should be taken before the decision to reduce to a 12 hour service is made.

Q17. Do you agree with the proposals in **recommendations 21 and 22** that there should be no laboratory facilities at local and enhanced hospitals and that pathology services for local hospitals, primary and community care should be provided by the nearest laboratory? If not, please state the reasons why.

Yes No

Response:

Q18. Do you agree with **recommendation 23**, that development of the new laboratory and mortuary infrastructure associated with the new configuration of services? If not, please state the reasons why.

Yes No

Response:

Equality implications

Q19. Are the proposals likely to have an adverse impact on any group of people in terms of the nine equality groups identified under Section 75 of the Northern Ireland Act 1998? If yes, please state the group or groups and the adverse impact(s) that you feel the proposals are likely to have on them.

Yes No

Response:

There may be an adverse impact on communities living further away from the larger acute hospitals. In the Newry and Mourne areas this may impact particularly on Nationalist and Catholic communities.

Q.20 Are you aware of any evidence, qualitative or quantitative, that the proposals may have an adverse impact on equality of opportunity or on good relations? If yes, please give details and comment on what you think should be added or removed to alleviate the adverse impact.

Yes No

Response:

Q.21 Could the proposals better promote equality of opportunity or good relations?
If yes, please give details as to how.

Yes No

Response:

Q22. Do you have any other comments on the recommendations or any suggestions that you would like to make to improve the promotion of equality of opportunity and/or good relations or human rights?

Yes No

Response:

THANK YOU FOR YOUR COMMENTS.