



Rt Hon Andrew Lansley CBE MP  
 Secretary of State for Health  
 Department of Health  
 Richmond House  
 79 Whitehall  
 London  
 SW1A 2NS

16 May 2011

Dear Secretary of State,

We are writing as a cross sector group of charities and organisations with an interest in children's health regarding the Health and Social Care Bill and the current listening exercise.

We will be responding to the listening exercise in more detail as individual organisations, but we thought it important to highlight to you at an early stage some of the key concerns we currently have about the Bill as it currently stands.

So far children and young people's specific needs are not sufficiently reflected in the Bill and there has been a notable lack of any debate or discussion on how the proposals will affect the services that they use and receive.

We are particularly concerned that the proposals currently appear to treat children as the same as adults and do not seem to recognise that infants, children and

young people have specific needs that must be reflected in the commissioning of services. For example, children and young people's health, well-being and future life chances are enhanced through a wide range of services, beyond health and social care; and schools and colleges, children's centres, youth services and youth offending teams all have a vital role to play. The Bill needs to reflect these differences.

We are seeking reassurances that:

- child health will receive adequate scrutiny through specific debate during the progress of the bill on the way the system will address the needs of children as distinct from adults;
- the current listening exercise will consider the way that reforms can improve children's health outcomes and make clear any changes to the legislation made as a result;
- the GP Consortia and Local Authority pilot schemes being run as part of the reforms will test the efficacy of the new frameworks for delivering and improving child health.

Our key proposals to improve the Bill for children and young people are:

- **Effective integrated commissioning across services:** The Bill must give a much stronger direction to health and well-being boards in promoting integrated commissioning with the other vital services for children commissioned by other bodies. There is particular concern around arrangements for child protection, transitions to adult services, children in care, children with special educational needs, disabilities and mental health conditions. GP consortia should be accountable to Health and Wellbeing Boards on their spending and activity, and both should have a duty to take into account Joint Strategic Needs Assessments in their commissioning arrangements;
- **Strengthening the engagement of children and young people:** Healthwatch England and Local Healthwatch must have strategies for engaging children and young people, including the most vulnerable, their parents and carers, in developing local and national services and decisions about their care and providing them with accessible information. Plans regarding patient involvement should explicitly include children and young people;
- **Commissioners understanding of children and young people's needs:** Proposals for the membership of GP Commissioning consortia should be extended to demonstrate the direct engagement of clinicians with child health expertise.
- **Commissioning across the right population size:** GP Consortia are unlikely to have the financial resources to commission services for the relatively small number of children with low incidence/high cost conditions. The NHS Commissioning Board should be required to ensure that GP consortia combine over larger populations to commission for children with complex needs.

We note the governments commitment to give due consideration to the UN Convention on the Rights of the Child when developing new policy and legislation and urge you to ensure this is integrated into the current discussions.

We would appreciate any opportunity to discuss these issues further with you. We would also appreciate some feedback on the outcome of the recent listening event for the children's sector, and hope the points raised during it will be fed into listening exercise.

We enclose a copy of the cross sector statement on the Bill for your information.

Yours sincerely,

**NCB**

**Barnardos**

**Family Action**

**Action for Children**

**4Children**

**Catch 22**

**Early Childhood Forum**

**Unite**

**CPHVA**

**BACCH**

**BACD**

**Young Minds**

**Netmums**

**The Children's Society**

**WellChild**

**Participation Works**

**NCVYS**

**The Children's Trust, Tadworth**

**Family Lives**

**Fostering Network**

**Clic Sargent**

**ACT**

**Voice**

**Children's Hospices UK**

For more information, please contact Sally Cole, Senior Policy Officer, NCB. 020 7843 6013 [scole@ncb.org.uk](mailto:scole@ncb.org.uk)