



## **Health and Social Care (Quality and Engagement) (Wales) Bill**

### **Introduction**

The College of Podiatry would like to thank the Committee for providing us with the opportunity to respond to the publication of the draft Bill.

Overall, the College of Podiatry is very supportive of the broad aims and principles of the legislation. The College of Podiatry is of the belief that any measures which are implemented to improve quality and engagement with patients will be welcomed by both service users and staff, and that this will improve patient care.

The College of Podiatry has thoughts on particular aspects of the Bill, which are grouped under the below headings.

### **Placing quality considerations at the heart of all the NHS in Wales**

The College of Podiatry thinks it is fundamental that quality considerations are at the heart of all the NHS does in Wales. We think that this requires legislation because, unfortunately, the experience of NHS Podiatrists over the last few years has been that decisions, particularly with reference to budget cuts, have not been made with quality considerations in mind. Across all Board areas, podiatry services focusing on prevention have seen cuts, which in the view of podiatrists, have been made at the expense of quality for service users.

A major focus for Podiatry services is prevention across a number of areas. To take one example, podiatrists can provide assessment, diagnosis and treatment within the community for Peripheral Arterial Disease. Where this happens, people receive tailored treatment plans earlier, and in an evaluation of one model, only 6% of people were referred to vascular specialists within secondary care for assessment.<sup>1</sup> This increases capacity in secondary care, speeds up access to

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<sup>1</sup> Community triage for lower limb vascular concerns, Salford Royal Foundation Trust (October 2016)

vascular surgery for patients who need this most and critically supports vascular rehabilitation, preventing symptoms from becoming more severe and a need for secondary intervention. This keeps people out of hospital and allows them to access the care they need closer to home. There are many other examples of this, such as musculoskeletal led podiatry services which help to keep people active thus preventing obesity, illness and disease, and podiatry care for diabetes patients which prevents diabetic foot ulceration and ultimately lower limb amputation with the associated risk of this.

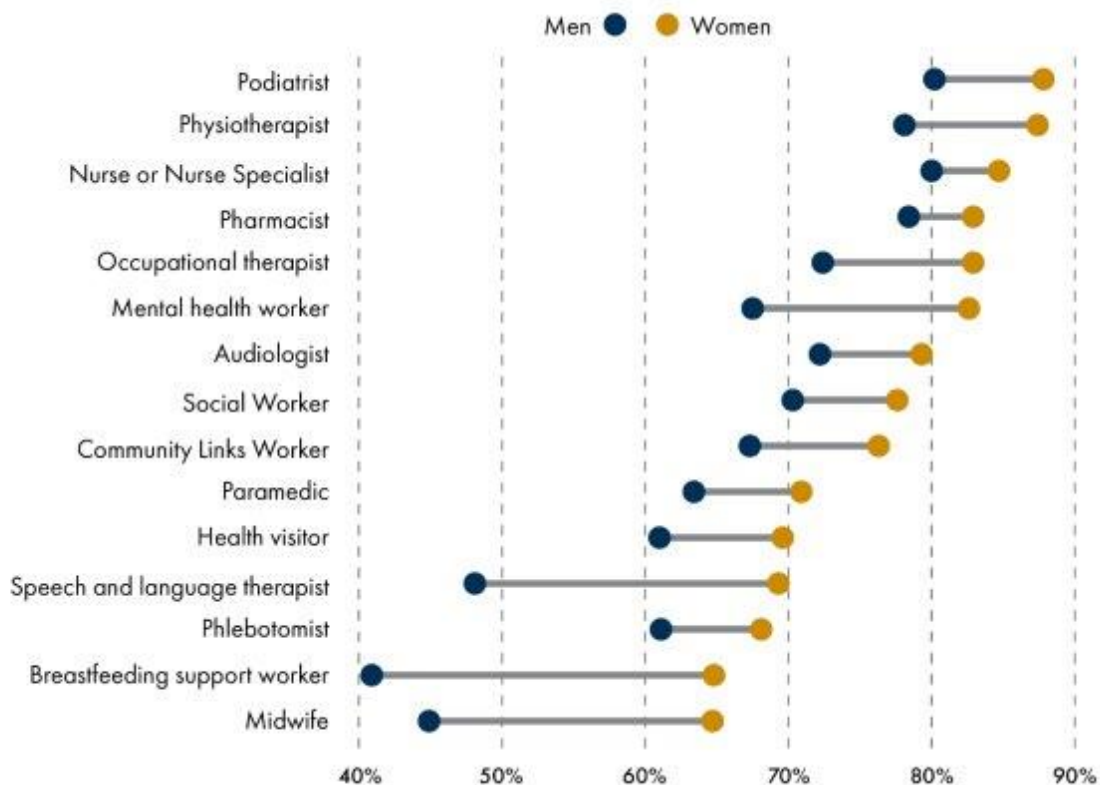
With across the board investment in preventative services, podiatrists and other healthcare professionals will be able to make a full contribution towards the Welsh Government's health strategy 'A Healthier Wales'. The College of Podiatry welcomes the understanding from Welsh Government, as laid out in the explanatory memorandum, that the risks of not legislating in this area will be that this obstructs the preventative agenda. The College of Podiatry hopes that the implementation of the Bill will ensure there is a re-balancing across Welsh NHS Boards away from cutting preventative services, (which all too often have been regarded as low hanging fruit which has resulted in a less effective and ultimately safe service for patients with a range of healthcare needs), towards effective preventative services.

### **Strengthening the voice of citizens across health and social services**

The College of Podiatry welcomes the provision within the Bill to strengthen the voice of citizens. We are of the belief that if the citizen voice is strengthened, there will be less cuts to services which are vital to support patient care and that NHS Wales will provide a better service for patients.

As autonomous practitioners, podiatrists practice independently of medical direction and supervision within the NHS. It is vital that people are able to access the right professional at the right time to enable timely diagnosis, treatment and onward referral if necessary. Podiatrists have the ability to work as first point of contact practitioners for a range of foot and lower limb complications, and The College of Podiatry is of the belief that Podiatrists across Wales are not being used to their full potential in this area.

We know from public surveys that service users want to see the right healthcare professional for their needs, and this means that first point of contact roles should be fully expanded to podiatry teams. A recent survey of over 2500 service users in Scotland found that podiatrists are the healthcare professionals that the public would most like to be able to see in primary care without having to go through a GP.<sup>2</sup>



The Scottish Parliament Health and Sport Committee, *What Should Primary Care Look Like for the Next Generation?* Published 3 July 2019

Podiatrists also have a major role in the delivery of prudent healthcare through various models such as the putting feet first pathway which requires patient activation and self-management in the delivery of their own care. This supports the aims and ambitions contained within Welsh Government's 'A Healthier Wales'.

<sup>2</sup> <https://sp-bpr-en-prod-cdnep.azureedge.net/published/HS/2019/7/3/What-should-primary-care-look-like-for-the-next-generation-/HSS052019R9.pdf>, pg. 14-15

### **Placing a duty of candour on NHS organisations**

The College of Podiatry fully supports the proposals to introduce a duty of candour within NHS Wales. Whilst this is something that will take effect at Board rather than service level in Wales, our view is that transparency and openness should be integrated fully across health and social care.

The disparity between Wales and the rest of the UK in this area is currently a significant challenge, especially because, for geographic reasons, some patients experience NHS treatment on both sides of the border.

The working group's definition of what defines 'unexpected or unintended harm which is more than minimal' will be critical in shaping this duty and The College of Podiatry would expect that once this was defined that this would be put out to stakeholders for consultation.

### **Strengthening the governance arrangement for NHS Trusts**

The College of Podiatry thinks that the proposals to harmonise the organisational relationship between NHS Boards, Trusts and Welsh Government are sensible and does not envisage any unintended consequences as a result of legislating in this area.

### **Contact**

For any queries related to this submission please contact: [Policy and Public Affairs Officer, The College of Podiatry](#)