

## Response ID ANON-9K5H-JQTY-9

Submitted to **Your views: building a strong, integrated care system across England**

Submitted on 2021-01-08 18:15:14

### Integrated Care System (ICS) legislation

#### 1 What is your name?

**Name:**

Ruth London

#### 2 In what capacity are you responding?

**In what capacity are you responding?:**

Charity, patient representative organisation or voluntary organisation

**If you have selected 'Other', please specify::**

#### 3 Are you responding on behalf of an organisation?

Yes

**Organisation name::**

Fuel Poverty Action

**Email::**

fuelpovertyaction@gmail.com

#### 4 Do you agree that giving ICSs a statutory footing from 2022, alongside other legislative proposals, provides the right foundation for the NHS over the next decade?

Strongly disagree

**If you have any specific comments or additional information to provide, please provide it in the text box below::**

We are concerned about the increased contracting out of services, which we have seen play havoc with standards, including safety standards, in housing provision and repair. This is exacerbated by removing Public Contracts Regulation safeguards over social, environmental and labour standards. It is crucial to be able to rule out bidders whose track record is poor. To remove this can only lead to more disasters, as has been proved with fire safety.

#### 5 Do you agree that option 2 offers a model that provides greater incentive for collaboration alongside clarity of accountability across systems, to Parliament and most importantly, to patients?

Strongly disagree

**If you have any specific comments or additional information to provide, please provide it in the text box below::**

No, it removes local accountability and substitutes control by anonymous bodies over which patients, local doctors and their communities have little influence, and even MPs may be powerless in the face of corporations that may be based overseas.

Collaboration in practice means increased reliance on bodies whose bottom line is profit, not health.

#### 6 Do you agree that, other than mandatory participation of NHS bodies and Local Authorities, membership should be sufficiently permissive to allow systems to shape their own governance arrangements to best suit their populations needs?

Strongly disagree

**If you have any specific comments or additional information to provide, please provide it in the text box below::**

NHSE Health Systems Support Framework (HSSF) prioritises financial considerations over the needs of patients. People in fuel poverty suffer all sorts of health problems, from respiratory conditions to mental ill health. We are terrified that they will no longer be able to rely on the NHS to support them through these crises. It could also become harder to implement measures like "prescriptions" that help people access other services, eg housing.

#### 7 Do you agree, subject to appropriate safeguards and where appropriate, that services currently commissioned by NHSE should be either transferred or delegated to ICS bodies?

Strongly disagree

**If you have any specific comments or additional information to provide, please provide it in the text box below::**

This is and must remain a NATIONAL health service, not one that is impoverished in poorer areas or where standards are subject to a postcode lottery.