



Department of  
**Health**

An Roinn Sláinte

Mánnystrie O Poustie

[www.health-ni.gov.uk](http://www.health-ni.gov.uk)

## ANNEX A

### Consultation Questionnaire

# RESHAPING BREAST ASSESSMENT SERVICES

Proposals for the Future Model of Breast Assessment  
Services for the Population of Northern Ireland

25 March 2019 – 17 June 2019

## CONSULTATION RECOMMENDATIONS AND QUESTIONS

**Recommendation 1: A regional Breast Assessment Network will be established by December 2019 to oversee implementation and ongoing delivery of the future model of Breast Assessment Services, to include all Trusts, commissioners and services working together to shape and support service provision for the population of Northern Ireland.**

Question 1: Do you agree that a Breast Assessment Network should be established as part of the future service delivery model?

**Recommendation 2: Breast Assessment Services for the population of Northern Ireland will be provided in no more than three locations by December 2020.**

Question 2: Do you agree that Breast Assessment Services should be provided in no more than three locations?

**Recommendation 3: The three breast assessment locations will comprise:**

- **Altnagelvin Area Hospital**
- **Antrim Area Hospital**
- **Greater Belfast (likely to be the Ulster Hospital subject to the development of appropriate patient pathways).**

Question 3: Do you agree with the proposal to consolidate service delivery at these three locations?

**Recommendation 4: Patient referrals to Breast Assessment Services in Northern Ireland will be managed through a central booking system by December 2020.**

Question 4: Do you agree that patient referrals to Breast Assessment Services should be managed through central booking system?

## RESPONDING TO THE CONSULTATION

You can share your views on Breast Assessment Services in a number of ways.

Our website <https://www.health-ni.gov.uk/consultations/reshaping-breast-assessment-services> provides full details of the consultation, including panel meetings and ways to get in touch.

The questionnaire below has been designed to help you to record your comments and views. This can be completed and submitted in the following ways:

- Submit to us online at: <https://consultations.nidirect.gov.uk/>
- Download and Email us at: [BreastAssessmentConsultation@health-ni.gov.uk](mailto:BreastAssessmentConsultation@health-ni.gov.uk)
- Download, print and post to:

**Reshaping Breast Assessment Services  
Department of Health  
Annexe 3  
Castle Buildings  
Stormont Estate  
Belfast BT4 3SQ**

You can also request a meeting with a panel of experts in your local area to ask questions about the proposals and share your views in person. Further details of events in your area will be made available at the above website.

This document is also available in alternative formats on request. Please contact the Department, at the address above or by phoning 9052 0551, to make your request.

Before you submit your response, please read the information at **Annex A** about the effect of the Freedom of Information Act 2000, the Environmental Regulations 2004, the Data Protection Act 1998 (DPA) and the General Data Protection Regulation (EU) 2016/679 on the confidentiality of responses to public consultation exercises.

For further information about how we process your information please see the following link which will take you to the Departmental Privacy Notice:

<https://www.health-ni.gov.uk/sites/default/files/publications/health/DoH-Privacy-Notice.pdf>

## SECTION 1: CONSULTEE DETAILS

### CONSULTATION RESPONSE FORM

I am responding:

As an individual

As a health and social care professional

On behalf of an organisation



(please tick one option)

About you or your organisation:

Name (optional):	Brendan Hegarty
Job Title:	Chief Executive
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**If replying as an individual, please indicate if you do not wish for your identity to be made public.**

**The last date for responses to this consultation is 17 June 2019.**

## SECTION 2: CONSULTATION QUESTIONNAIRE

<b>Question 1: Do you agree that a Breast Assessment Network should be established as part of the future service delivery model?</b>	<u>Yes</u>	•
	<u>No</u>	

**Please use this space to expand your answer.**

The Council supports the establishment of a Breast Assessment Network as part of future service delivery. However, the Council is strongly opposed to the removal of services from any centre. Many residents within the Fermanagh and Omagh District already face long journeys and by removing centres such as that in Craigavon would leave them facing longer travel distances and journeys.

The Council understands that proposed system identifies three centres, going forward. However, this will not improve service delivery for all of Northern Ireland. It will have significant negative impacts on individuals from the Fermanagh and Omagh District (particularly the southern areas of the District) creating additional travel times and longer travel distances.

It is important that the Network develops system-wide guidelines, protocols and quality standards to improve and standardise the cancer care that the people of Northern Ireland deserve.

<b>Question 2: Do you agree that Breast Assessment Services should be provided in no more than three locations?</b>	<u>Yes</u>	
	<u>No</u>	•

**Please use this space to expand your answer.**

The Council believes that the proposed system, which identifies three locations, will not improve service delivery for all Northern Ireland – particularly those within the Fermanagh and Omagh District.

Placing services at the three suggested locations will have significant negative impacts on individuals from the Fermanagh and Omagh District (particularly the southern areas of the District) by creating additional travel times and longer travel distances. In addition, Council would question the rationale as to why a three centre model was brought forward when the Breast Assessment Project Board's research recommended a four centre model.

By removing services from two busy locations, the Council has concerns that the three remaining locations would be able to cope with the additional demands which would impact on their ability to assess individuals within the ministerial standard of 14 days. Regularly over the last 12 months, there have been many occasions when various HSCT areas across Northern Ireland have failed to meet the 14-day standard and the Council would be concerned about fewer centres having a further negative impact on this.

Council would recommend that further consideration should be given to the development of:

- ❖ Integrated digital platforms to allow the transfer of diagnostic information across our region, such as a single integrated picture archiving and communication system (PACS) in radiology and a similar model for pathology images,
- ❖ Defined regional clinical leadership for diagnostic modalities,
- ❖ More effective use of resources, including the development of virtual networks to allow clinical teams to work in partnership, including encouragement of Consultants, where possible, to practice in centres outside Altnagelvin Hospital, and
- ❖ Agreed co-produced clinical and operational standards for all diagnostic services across Northern Ireland.

It is also important to consider the impacts on the existing workforces, particularly in the Units which would be facing closure including:

- Resource implications of potential procurement and implementation of new ways of working
- Costs and time taken for staff to travel between different sites
- Costs of more staff attending longer Multi Disciplinary Team meetings
- Staff dissatisfaction with proposed changes and potential impact on retention of current staffing particularly those close to retirement
- Risk of less personal service

<b>Question 3: Do you agree with the proposal to consolidate service delivery at the three stated locations (i.e. Altnagelvin Area Hospital Antrim Area Hospital, and Greater Belfast (likely to be the Ulster Hospital subject to the development of appropriate patient pathways)?</b>	<u>Yes</u>	
	<u>No</u>	•

**Please use this space to expand your answer.**

Individuals who are referred to Breast Clinics have been done so following initial breast screening tests. These individuals are likely to be distressed, worried and apprehensive about the entire process. Asking these people, and their family/friends, to travel further for assessment and treatment is simply unfair.

Increased users for a proposed 'three-centre' approach is likely to have negative impact in relation to efficiency and smooth running of services. Removing two centres providing a vital service is likely to result in over 1,000 patients being misplaced from their current (or local) clinics and arriving at one of the three remaining centres. Is any hospital ready to accommodate these numbers within the ministerial standard of 14 days?

Council notes the following comments from Dr Gwyneth Hinds, a Consultant Specialist:

"The Belfast City Hospital breast assessment unit has been built up over many years, we have an excellent team.

"We are also beside the Regional Cancer Centre, Queen's University, the medical school with all the researchers, the BRACA clinic which deals with hereditary breast cancer.

"Why would we want to start breaking all that up? Yes centralisation is important but the main cancer assessment centre for Northern Ireland should remain in Belfast. "

"The report does not acknowledge that 50% of all attendees at Belfast City Hospital travel from other trust areas or that it deals with 33% of all referrals in Northern Ireland."

Accordingly, should there be a consolidation into three locations, Council would recommend that a model based on Belfast City Hospital, Altnaglevin Area Hospital and Craigavon Area Hospital would provide a more equitable geographic spread across Northern Ireland.

Council notes the comments within the Consultation document:

- “A shortage of specialist staff required to provide timely breast assessment services, in particular consultant radiologists. This is reflective of the shortage of radiologists both nationally and internationally, which will be considered separately as part of the Department’s regional review of imaging services for Northern Ireland.”

and would stress that any final decisions in relation to the location of Breast Assessment Services must be informed by the outworkings of that review.

Additionally, the Fermanagh and Omagh District (as well as Northern Ireland as a whole) is an ageing population. Whilst the vast majority of Breast Cancers are detected in females, the vast majority (81%) occur in females over the age of 50 years of age. Therefore, with the ageing population, the demands for Breast Assessment Services will inevitably increase going forward. It is important that there is greater promotion of the service provided by the mobile screening unit.

Between 2007 and 2016 the number of Breast Cancer cases in Northern Ireland has increased by 23.99% (1,159 cases in 2007 to 1,437 cases in 2016). Going forward, will three locations have the ability to meet an ever increasing demand in services?

Most recent statistics demonstrate that within the District, there are approximately 82 new cases of Breast Cancer every year. Statistics also show that Breast Cancer is also the cause of 17 deaths every year within the District.

Those who are referred for further assessment, after initial screening, will be nervous and concerned about what the future holds, therefore it is beneficial to offer these services as close to their home as possible – meaning that they can avail of as much support that they require from family, friends, neighbours, etc.



<b>Question 4: Do you agree that patient referrals to Breast Assessment Services should be managed through central booking system?</b>	<u>Yes</u>	•
	<u>No</u>	

**Please use this space to expand your answer.**

The Council acknowledges that other health systems (i.e. those in England) have a centralised 'e-referral' 'choose and book' type system in operation. It would be extremely beneficial to have such a system in place in Northern Ireland – allowing the patient to choose a time and a location which is most suitable for them.

However, in Northern Ireland, there is a difficulty in some areas with rural broadband and telephone connectivity, particularly in isolated rural communities. This could place some people at a significant disadvantage to others who live in more connected and urban centres.

By putting in place a Centralised Booking System, especially if it is online, it may also have a negative impact on older people. There are still significant sections of the community (particularly older people) who are not online and still prefer to book places or receive information in the traditional methods.

Therefore, the introduction of any centralised booking system should take into consideration the needs of these groups of people to ensure that they are not excluded.

The Council also notes that there is little consistency in how GPs refer patients across Northern Ireland and a centralised booking system would assist with adopting a more consistent approach. However, the introduction of any new centralised system should only be done so to ensure that all people who are referred experience a quicker, and more efficient, process with little waiting time and all 'red flag' referrals being assessed within 14 days.

## SECTION 3: EQUALITY AND HUMAN RIGHTS

Section 75 of the [NI Act 1998](#) requires departments in carrying out their functions relating to NI to have due regard to the need to promote equality of opportunity:

- between persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation;
- between men and women generally;
- between person with a disability and persons without; and
- between persons with dependants and persons without.

You may wish to refer to the Equality Screening, Disability Duties and Human Rights Assessment Template at <https://www.health-ni.gov.uk/consultations>

<b>Question 5: Are any of the options set out in the consultation document likely to have an adverse impact on any of the nine equality groups identified under Section 75 of the 1998 Act?</b>	Yes	√
	No	
<p><i>If yes, please state the group(s) and provide comment on how these adverse impacts could be reduced or alleviated in the proposals:</i></p> <p>The Council has concerns that the proposed locations of the three service delivery sites set out within these proposals would have significant adverse impacts on individuals within the Fermanagh and Omagh District.</p> <p>Groups who may be significantly impact upon include: people over the age of 50 years, females, people with disabilities and those who have caring responsibilities.</p> <p>Others who may be impacted up include: all patients, relatives, friends, carers and those who live in isolated rural communities.</p>		
<b>Question 6: Are you aware of any indication or evidence – qualitative or quantitative – that any of the options set out in the consultation document may have an adverse impact on equality of opportunity or on good relations?</b>	Yes	√
	No	
<p><i>If yes, please give details and comment on what you think should be added or removed to alleviate the adverse impact:</i></p> <p>Relocation of Breast Assessment Services would also affect recruitment to other health care disciplines by seriously affecting confidence in the longer term</p>		

sustainability of the hospital. Future trainees and staff would not commit to a hospital with a downgraded and reduced service profile.		
<b>Question 7: Is there an opportunity to better promote equality of opportunity or good relations?</b>	<b>Yes</b>	√
	<b>No</b>	
<p><i>If yes, please give details as to how:</i></p> <p>Consideration should be given to an alternative Model based on The Belfast City Hospital, Altnagelvin and Craigavon Area Hospitals.</p>		
<b>Question 8: Are there any aspects of the proposals in the consultation where potential human rights violations may occur?</b>	<b>Yes</b>	√
	<b>No</b>	
<p><i>If yes, please give details as to how:</i></p> <p>In relation to the removal of the services provided at Craigavon Area Hospital, Council wishes to highlight the following potential Human Rights Violations which could ensue:</p> <p>Article 14 “Protection from Discrimination” – The adoption of this Models would result in a disproportionate adverse effect on the elderly, the disabled, carers and people living in rural areas.</p>		

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## SECTION 4: RURAL IMPACT

The Rural Needs Act (NI) 2016 became operational on the 1 June 2017 and places a duty on public authorities, including government departments, to have due regard to rural needs when developing, adopting, implementing or revising policies, strategies and plans and when designing and delivering public services. A draft rural needs impact assessment has been prepared against these policy proposals.

<b>Question 9: Are the actions/proposals set out in this consultation document likely to have an adverse impact on rural areas? (Please Tick)</b>	<b>Yes</b>	<b>√</b>
	<b>No</b>	
<i>If yes, please provide comment on how these adverse impacts could be reduced or alleviated:</i>		
<p>The Council would have serious concerns about the adverse impact these proposals will have on rural communities – particularly isolated rural communities in the Femanagh and Omagh District. The adoption of the proposed three-location approach will have significant adverse impacts on rural areas of the District, particularly southern and western area.</p> <p>These impacts will include:</p> <ul style="list-style-type: none"> <li>• Increased travel time.</li> <li>• Increased costs.</li> <li>• Fewer visits/trips with family members and friends.</li> <li>• Slower recovery times, with much time spent travelling in vehicles.</li> </ul>		

**Responses must be received no later than 5pm on 17 June 2019.**

**Thank you for your comments.**

## **Confidentiality and Access to information Legislation**

The Department may publish a summary of responses following completion of the consultation process. Your response, and all other responses to the consultation, may be published or disclosed on request in accordance with information legislation; these chiefly being the Freedom of Information Act 2000 (FOIA), the Environmental Information Regulations 2004 (EIR), the Data Protection Act 2018 (DPA) and the General Data Protection Regulation (GDPR) (EU) 2016/679. The Department can only refuse to disclose information in exceptional circumstances. Before you submit your response, please read the paragraphs below on the confidentiality of consultations and they will give you guidance on the legal position about any information given by you in response to this consultation.

The FOIA gives the public a right of access to any information held by a public authority, namely, the Department in this case. This right of access to information includes information provided in response to a consultation. The Department cannot automatically consider as confidential information supplied to it in response to a consultation. However, it does have the responsibility to decide whether any information provided by you in response to this consultation, including information about your identity should be made public or be treated as confidential.

If you do not wish information about your identity to be made public please include an explanation in your response. Being transparent and providing accessible information to individuals about how we may use personal data is a key element of the DPA and the General Data Protection Regulation (EU) 2016/679. The Department is committed to building trust and confidence in our ability to process personal information. This means that information provided by you in response to the consultation is unlikely to be treated as confidential, except in very particular circumstances.

For further information about confidentiality of responses please contact the Information Commissioner's Office on **0303 123 1113** or via <https://ico.org.uk/global/contact-us/>