

# Consultation response form

## Freedom of Information

We manage the information you provide in response to this consultation in accordance with the Department of Health's [Information Charter](#).

Information provided in response to this consultation, including personal information, may be published or disclosed in accordance with the access to information regimes. The relevant legislation in this context is the Freedom of Information Act 2000 (FOIA) and the Data Protection Act 1998 (DPA).

If you want the information that you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals amongst other things, with obligations of confidence. In view of this, it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Department will process your personal data in accordance with the DPA and in most circumstances this will mean that your personal data will not be disclosed to third parties. However, the information you send us may need to be passed on to colleagues within the UK Health Departments and/or published in a summary of responses to this consultation.

I do not wish my response to be passed to other UK Health Departments   
I do not wish my response to be published in a summary of responses

Please indicate all the countries to which your comments relate:

UK-wide	<input checked="" type="checkbox"/>	<i>and/or</i>	
England	<input type="checkbox"/>	Northern Ireland	<input type="checkbox"/>
Scotland	<input type="checkbox"/>	Wales	<input type="checkbox"/>

Are you responding: - as a member of the public   
- as a health or social care professional   
- on behalf of an organisation

## Country of qualification

Please indicate as appropriate:

UK  Other EEA  Rest of World

Area of work:

NHS	
NHS – Clinical Commissioning Groups	
NHS England Clinical Reference Groups	
NHS England Area Teams	
Social Care	
Private Health	
Third Sector	X
Regulatory Body	
Professional Body	
Education	
Trade Union	
Local Authority	
Trade Body	
Independent Contractor to NHS	
Manufacturer	
Supplier	
Other (Please give details)	

**If you are responding on behalf of an organisation, please indicate which type of organisation you represent:**

NHS	
NHS – Clinical Commissioning Groups	
NHS England Clinical Reference Groups	
NHS England Area Teams	
Social Care	
Private Health/Independent Sector	
Third Sector	Patient Charity
Regulatory Body	
Professional Body	
Education	
Trade Union	
Local Authority	
Trade Body	
Independent Contractor to NHS	
Manufacturer	
Supplier	
Other (Please give details)	

## Renal dialysis services

Q1. Are the proposals NHS England has made for producing commissioning guidance to support Clinical Commissioning Groups in taking on the commissioning responsibility for renal dialysis services appropriate?

Yes	No	X	Don't know
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Add text:

Little or No consultation has taken place with CCG's let alone understanding the gaps in knowledge to produce guidance.

No proper consultation has taken place with the NKF(National Kidney Federation) to date – NKF is fully willing to engage in consultation

Q2. Is there any additional support that Clinical Commissioning Groups might need from NHS England to enable them to take on this new role and ensure renal dialysis services are commissioned and delivered to a high standard?

Yes	X	No	Don't know
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Add text:

They have not been consulted, are not knowledgeable about renal patients or keen to take on the responsibility.

Extensive support will be necessary for GP's

NKF would like CCG's to involve patients on the ground in their work and decision making

Q3. How long might this support be needed for??

Add text:

Renal is a highly complex area. Support would be on-going for a very long time – it should not be transferred at all to level three. It should stay where it is – level one.

Q4. What ongoing monitoring arrangements should be put in place and who should be responsible for ensuring that the transfer is effective and is working well?

Add text:

The only people who understand requirements are the nephrologists and renal nurses.

Regular surveys of kidney patients should be undertaken by CCG's the results considered, published and any actions needed undertaken

Q5. Subject to the safeguards and support described in this document, do you think it is feasible to transfer commissioning responsibility for renal dialysis services to Clinical Commissioning Groups from 1 April 2015?

Yes

No

Don't know

Add text:

It is a ridiculously short period and highly dangerous to renal patients

Patient safety in the future is at risk by these proposals

This will create the ultimate post code lottery of Dialysis provision

The questions asked in the consultation reply form in respect of the transfer of renal services are completely **inadequate** for a proper consultation process.

The replies entered on this form **MUST** be read in conjunction with the submission from the NKF marked

#### **DOCUMENT A**

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