



GRESFORD COMMUNITY COUNCIL

CYNGOR CYMUNED GRESFORD

Gresford Engagement,
Alyn Family Doctors
Llay Health Centre
School Road,
Llay,
Wrexham
LL12 0TR

19th August 2021

Dear Alyn Family Doctors

Re: Gresford Health Centre proposed closure and Consultation

Gresford Community Council thank you for the opportunity to comment on the proposed closure of Gresford Health Centre. An Extraordinary meeting of the Community Council was held on Monday evening, and the following concerns and comments were raised:

1. Flawed Consultation Process:

Gresford Community Council maintain that the consultation process is flawed. The usual format for consultation is to provide a question-and-answer sheet. This provides structure to the consultation: questions can be asked, and responses measured. This would enable you to properly collate the comments that you receive and publish them in due course. Many may be discouraged from making their feelings known without a structured format within which to do so. Can you please advise to what purpose and in what format will you be collating the comments received? Will these be results be made available in the public domain?

Not all residents/ patients of the practice have received a copy of the letter sent out. Gresford Community Council are concerned that Alyn Family Doctors may have effectively been 'misregistering' 'Gresford Health Centre' patients as 'Llay' or 'Rossett' patients. We have evidence that persons new to the area, living in Gresford, have been registered as Rossett patients, when in fact they would have been registered as Gresford Health centre patients, had the Health Centre been able to be open. Therefore, in a consultation of this nature, where you state that you are 'consulting' with Gresford Health Centre patients, you have effectively disenfranchised Gresford Health Centre patients from this process by the way in which they have been registered on your system. Please can you provide an answer on this point.

The Community Council also considers the consultation process to be flawed because of its timing. It has already written to you on this point, but you have not seen it as necessary to extend the deadline. August is traditionally a poor time to undertake a consultation if you are serious

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about engaging with as many members of the public as possible. Many people are away or otherwise occupied with childcare and may miss the opportunity especially given the short deadline you have decided upon. The Council is also concerned that the reply received from BCUHB, in answer to the request that the consultation period be extended to give patients a fair chance to respond, quoted heavily from your own letter. This gives the strong impression that BCUHB supports the intention to withdraw GP services from Gresford. As BCUHB will be adjudicating on this matter, it is concerning that they appear to have already 'decided' on the outcome. In 2018 BCUHB said that GP services should NOT be withdrawn from Gresford Health Centre, but they have been, which leaves the impression that 'consultation' is possibly cynical as well as flawed.

You have also failed to advertise your consultation widely. The Community Council has taken the initiative to advertise the consultation on noticeboards, on its websites and in many locations around the village, on your behalf. The Community Council believes that all patients affected by this proposal should have been made aware of it, and invited to comment; this includes patients in Rossett and Llay who will clearly be impacted by a decision to withdraw GP services from Gresford and send Gresford patients to these two locations instead. Again, the consultation can be seen as flawed because you have not been proactive in this way, and there remains the concern that many of your patients will not be able to access information online.

A flawed consultation process will result in flawed conclusions which may not be fully representative nor confidently relied upon.

2. Patient Engagement:

When the closure of the Health Centre was first raised and discussed, some three years ago, you gave a commitment to having a Patient Engagement Group, and this was also required by BCUHB. Gresford Community Council maintain that this has failed and has not been committed to by the Practice. We appreciate that COVID intervened at a certain point, and resources were taken up elsewhere. Nevertheless, it was deemed to be failing prior to this, and, regarding this most recent consultation, members of the Patient Engagement group were unaware that this was to take place. There has been no meeting called for well over twelve months, and prior to that there were hardly any meetings called. During the COVID period, despite groups meeting effectively using electronic means, the Practice did not avail itself of this opportunity to enable to Patient Engagement Group to meet, despite members responding positively. No minutes were taken to be made available to other patients, which is a failing of engagement.

3. Statistics provided :

In your letter you quote a number of statistics that you say are based on the number of people using the Health Centre. For example:

"Gresford is the least used of our health centres.....only 82 patients used Gresford exclusively....".

As stated previously, from 2018 onwards, patients were routinely not offered an appointment at Gresford Health Centre, but instead were diverted to Llay or Rossett. Therefore, Gresford Community Council maintain that this statistic, as a basis for the rationale for closing the Health Centre, is meaningless, and invalid, because it is a statistic of your own making, and it does not demonstrate a preference of the patients of Gresford Health Centre, who, had they been offered an appointment at Gresford would have preferred one there, and found it more convenient.

The Community Council are concerned about patient registration statistics. There must be many people who for the past three years have not been given an option as to how they are registered, whether as a Gresford, Rossett or Llay patient. How many Gresford residents have been registered as a Llay or Rossett patient in the period since BCUHB ruled that Alyn Family Doctors should NOT withdraw GP services from Gresford Health Centre? As from this point forward the

Health Centre was routinely and consistently closed for long periods notwithstanding the BCUHB decision, and this was well before the COVID pandemic.

The Community Council would welcome the publication of statistics on a frequent, consistent and transparent basis. 'Snapshot' statistics of the kind presented by Alyn Family Doctors in their consultation letter do not generate trust and do not support your arguments for the closure of the Gresford Health Centre.

The Community Council has asked repeatedly for a comparative breakdown of the footfall through the Health Centre- 12 months prior to the reduction in hours, and since that time.

4. Closure of the Gresford Health Centre to GP appointments despite the BCUHB instruction to not do so.

You state that in 2020 you closed the Gresford Health Centre, and you have blamed COVID. In reality, Alyn Family Doctors have been 'winding down' the use of Gresford Health Centre for some considerable time. While you have not technically 'withdrawn' from Gresford Health centre as yet, you stopped offering GP appointments at this location some considerable time ago. It has not been possible for many patients, even prior to the pandemic, to obtain an appointment at Gresford Health Centre, because you were not putting GP staff in there. Therefore, Gresford Community Council believes that the practice has already been closed by stealth, and therefore any arguments put forward otherwise for the closure, are invalid. You should not use the COVID pandemic to further your arguments to withdraw GP services from Gresford Health Centre. This is not a transparent method to explain your reasons for wishing to cease operations in Gresford.

5. Equity of provision.

In your consultation letter you say:

'You can choose to speak to a doctor or nurse in either location'.

Clearly, however, there is a finite number of appointments at each of these venues which will limit a patient's ability to exercise this choice. If this withdrawal of services from Gresford were to go ahead, how do you propose to implement patient preferences across the whole AFD area of operation?

Will all patients be treated equally, and in the same way, regardless of where they live?

Or will Rossett residents be given preferential access to Rossett appointments, and Llay patients preferential access to Llay appointments, with Gresford and Marford patients being fitted into whatever is left?

The Community Council is concerned about equity of access and provision for patients from Gresford and Marford in the allocation of appointments and would request reassurance that all patients are to be treated equally, regardless of where they live. Rossett and Llay patients might well then have to travel to either site for appointments in the same way that Gresford and Marford patients might. This strengthens the argument made in point 1, above, that this consultation should have been extended to patients resident in Rossett and Llay for comment. Please explain the processes used in allocating appointments fairly and equitably to all patients, regardless of where they live.

6. Unsuitability of Rossett Surgery and drawbacks to increased use of Llay Health Centre

In previous communications Gresford Community Council has raised a number of concerns with you about Rossett surgery. You maintain this is a suitable alternative location for Gresford and Marford residents to travel to, via public transport. Gresford Community Council maintain this is *not* a suitable alternative location for the following reasons:

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- Difficulties in accessing either surgery from Gresford or Marford will be particularly acute in the winter months; there is a long walk down Station Road at Rossett to and from the bus stop.
- There are also concerns in terms of patient capacity at the surgeries, particularly at Rossett. The surgery at Rossett is small, with limited seating, and there is no waiting provision for children at Rossett as there is at Gresford.
- The consulting rooms are not confidential; discussions can be heard in the waiting room.
- The entrance way is narrow; people are forced into close proximity when passing to enter or exit the building.
- There is no dedicated disabled parking at Rossett as there is at Gresford and Llay health centres.
- Station Road is prone to flooding in winter months and has been several times in recent years.

Similarly, the Council has concerns about Llay Health Centre:

- There is inadequate parking at Llay Surgery- The overflow car park is often locked, especially during school holidays.
- There is a long walk for elderly, ill or disabled patients from Llay New Road to the surgery and back again.
- Public transport requires four bus journeys and a wait at Wrexham bus station.

Gresford Health Centre was purpose-built for the delivery of health services. Rossett surgery is a converted domestic dwelling. The many rooms in Gresford given up to the health board for other services could be taken back for GP use if there are issues, as you say, relating to space; those health board services could be re-located. The building could be reconfigured to suit if there was a will amongst Alyn Family Doctors to maintain a GP presence there. It is clear that there is no such will. It is little comfort to Gresford patients to know that you have made improvements in Rossett and Llay. Gresford and Marford residents perceive that you have been intentionally neglecting Gresford for a considerable time. The 'consultation' letter asserts that you are 'rooted in this community' – but these proposals actually seek to completely uproot AFD from Gresford.

7. Transport for vulnerable and elderly persons, and low-income families:

Gresford Community Council maintains its concern that many elderly, vulnerable or disabled people, from Gresford and Marford, without family living nearby will have difficulty accessing transport. The withdrawal of services from Gresford Health centre will lead (and have led) to additional costs of transport to all patients. You state that in mitigation you have secured a discount with a taxi service, which although welcome, gives no guarantee that the availability of a taxi and the appointment made will coincide. There is also a potential privacy issue here. Patients ringing for a taxi will have to mention that they have a Doctor's appointment in order to secure the discount. Bus fares are not cheap, and even discounted taxi fares will be prohibitive for people on benefits or low incomes, forcing them onto the bus with all the disadvantages already alluded to. This presents additional costs to Gresford and Marford residents which they did not have previously.

The Community Council argues that this taxi fare discount is not enough to mitigate the difficulties and hardship which will be created by withdrawal of health services from Gresford. Public transport services from Gresford and Marford necessitate that four bus journeys are required. Bus timings may not always 'fit' neatly around an appointment. If someone is ill or vulnerable, they do not, or should not, be facing four bus journeys and a length of wait at the bus station in between, as well as a long walk to and from the Health centre at Llay. Gresford Community Council is concerned that many people, for this reason, may not access the GP health service, particularly in winter weather, when they mostly need it. The visiting service provided by Alyn Family Doctors is very welcome but it is, understandably, geared to those most vulnerable; the Council's concern is for those who do not fit the criteria of being 'housebound' – those on the cusp of the criteria, without access to a car, poorly, disabled, unwaged/low waged, parents with young children, single parents with young children. You state that the bus stop on Chester Road is only two minutes' walk away from the surgery. This is two minutes' walk away for a young and

fit person, probably not for an elderly or disabled person. You do not mention the length of the walk from the Llay New Road to the health centre at Llay.

8. Risk Assessments.

You state in your letter that a risk assessment was conducted in March 2020 and this informed your working arrangements, but you were not working out of Gresford Health Centre for some considerable time prior to this: as stated previously, no appointments were being offered. This is misleading. Presumably you have risk assessments relating to your rationale for closing Gresford Health centre and it would be useful to see these. Please can these be made public.

9. Increase in the carbon footprint generated by Alyn Family Doctors

The withdrawal of GP services from Gresford Health Centre will necessitate many more patient journeys by private car or by taxi and, if equity of provision regardless of where patients live (see point 5, above) is implemented this will not only involve patients from Gresford and Marford.

The sending of hundreds of patients a year back and forth to Rossett and Llay is at odds with the Welsh Government intention to reduce carbon emissions from transport, as set out in its *Net Zero Carbon Status by 2030* report published 9th August 2021.

'Mobility and Transport' is one of the Welsh Government's priority areas for action in relation to reducing the emissions' footprint. They highlight that, 'Citizen-centred models of service delivery reduce the need for travel by staff, visitors and service users.' Your proposals to withdraw the GP service from Gresford Health Centre is the total opposite of 'citizen-centred' and runs counter to the BCUHB *North Wales Cluster IMTP 2020-23* which sets out a commitment to reducing health inequalities. It focuses on 'care closer to home' as a way of reducing health inequalities. (Pg. 42) Your proposed withdrawal of services from Gresford Health Centre will *increase* health inequalities among Gresford residents.

10. Telephone service, e Consult and appointments:

You mention in your letter about improvements having been made to the telephone service. You do not appear to have sufficient appointments available. Residents report to us that often when they ring at 8 am and manage to get through, after listening to the message at 8.05 am, they are advised that all the appointments are taken. The many enhancements and improvements you list – including eConsult for those able to access it - are welcomed by the Community Council; however, they have no bearing on your persistent wish to withdraw GP services from Gresford – you would certainly have been making changes along these lines if Gresford had been kept staffed with GPs - and they do not yet appear to be enough to alleviate the pressures on appointments. You do not have an online appointments booking service as other practices do and we believe that this could be a step forward provided that a proportion of appointments for those not online are protected – equitable access and provision for all.

In summary, Gresford Community Council opposes the withdrawal of GP services from Gresford Health Centre. The Council is concerned that this consultation is flawed and narrowly circulated. Statistics which are being used to justify the rationale for closing the Gresford Health Centre have little basis in fact. We suspect that the decision to close Gresford Health Centre and maintain Rossett is based on mainly financial and business interests and has little to do with improved patient care. Certainly, when this was last attempted in 2018, financial reasons were suggested. The Community Council believes that Alyn Family Doctors ought to set out, clearly and

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transparently, their business case for withdrawing services from Gresford, rather than attempting to 'sell' it as a health care benefit to Gresford residents, which it self-evidently is not.

Your consultation letter states, 'This proposal is necessary because it allows us to provide a better service to you' - but nowhere in the document do you explain how withdrawing GPs from Gresford and making people without cars and in difficult circumstances undertake time-consuming and unnecessary journeys on buses and in taxis, benefits the people of Gresford.

Gresford Community Council has written to you on a number of occasions since 2018 and would be appreciative if these concerns could also be included. Copy letters can be provided if required.

Yours sincerely

S J Baxter

S. Baxter
Clerk to Gresford Community Council

c.c. Mr Rob Smith Betsi Cadwallader Health Board
North Wales Community Health Council
Mrs Lesley Griffiths, AM
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