

Lord Carter of Coles
Chairman
Cooperation and Competition Panel
1 Horse Guards Road
London
SW1A 2HQ

16 APR 2009

15th April 2009

Dear Lord Carter,

COOPERATION AND COMPETITION PANEL DRAFT INTERIM GUIDANCE CONSULTATION

I am writing to you on behalf of Assura Group to offer our views on the Co-operation and Competition draft interim guidelines consultation which the CCP is currently running. Whilst we have no significant comments on each of the areas of guidance – much of which we agree with in principle – we have some comments to make around implementation. I feel it is best to set these out in a letter.

Assura and its three business divisions – Medical, Pharmacy and Property – work together to deliver solutions to meet primary care needs. Our model is based on working collaboratively with GPs by offering start-up capital, ongoing financial and administrative support and expertise in understanding SHA and PCT priorities to enable groups of GPs to provide services effectively. Where they are required, Assura can also provide the new facilities to enable delivery of this range of new services.

Assura works on the basis of providing innovative solutions to meet the population's health needs and is a model predicated on requirements set out under *Any Willing Provider*. A level playing field across the NHS is therefore vital to allow us to work with our GP partners to improve the quality of service for patients and to guarantee value for money for the taxpayer.

The establishment of the CCP and the associated interim guidance are of particular importance since our experience has shown that, currently, whilst some PCTs do not directly breach the guidelines, they often undermine the spirit of the guidance by not effectively stimulating competition. This observation is supported by the *World Class Commissioning* scores which found that Competency 7, '*effectively stimulating the market to secure required clinical and health and wellbeing outcomes*', was the area where PCTs across the country performed the worst¹.

Our position therefore is that whilst we support the wording of the guidance it will be in the implementation where the largest challenges will be found. PCTs that do not make any attempts to stimulate a marketplace must be under no illusion that their lack of activity will be referred to the CCP and treated as harshly, if not more so, than those PCTs that make attempts to create a vibrant marketplace but fail in certain areas.

I hope you find this information helpful and please do not hesitate to get in touch if you require any further information or would like to meet to discuss it in greater detail.

Yours sincerely,

Bart Johnson
Group Business Development Director

Cc: Interim Guidelines Consultation Team, CCP

All correspondence, please, to:

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¹ Health Service Journal, 5th March 2009

http://www.hsj.co.uk/news/2009/03/pcts_exceed_expectations_world_class_commissioning.html