

## **Engagement Report for Service Specifications**

| Unique<br>Reference<br>Number   | 1649   |
|---|--|
| Specification<br>Title  | Specialised Complex Surgery for Urinary Incontinence and Vaginal and Uterine Prolapse.   |
| Lead<br>Commissioner  | Anthony Prudhoe  |
| Clinical<br>Reference<br>Group  | Specialised Women's CRG  |
|   |  |
| Which stakeholders were contacted to be involved in service specification development?                                    | All registered stakeholders with the Specialised Women's CRG. CRG members, including PPV members.  |
| Identify the relevant Royal College or Professional Society to the specification and indicate how they have been involved | Royal College of Obstetricians and Gynaecologists British Association of Uro-Gynaecologists (BSUG) British Association of Urological Surgeons (BAUS)  RCOG/BSUG are represented as an affiliate organisation on the CRG and have been involved development of the specification. BAUS have also been represented as part of the specification development. |

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|--|--|
|  | Clinicians, patients, commissioners, BSUG, Association of Coloproctology.  |
|  | Stakeholder decision to participate in stakeholder feedback.   |
|  | Limited patient responses, so as part of the public consultation the patient support groups around vaginal mesh will be directly contacted.                      |
| Which stakeholders have actually been involved?  | CRG clinical and PPV members BAUS CRG Stakeholders   |
| Explain reason if there is any difference from previous question   | Stakeholder decision to participate in stakeholder feedback  |
| Identify any particular stakeholder organisations that may be key to the specification development that you have approached that have yet to be engaged. Indicate why? | Limited patient responses, so as part of the public consultation patient support groups will be contacted directly   |
| How have stakeholders been involved? What engagement methods have been used?   | CRG, RCOG, BAUS and BSUG all been included in stakeholder testing. Standard stakeholder testing methods have been used plus direct emails to RCOG, BAUS and BSUG |
| What has happened or changed as a  | Changes have been made to the service specification in response to comments received   |

| result of their input?  |   |
|---|---|
| How are stakeholders being kept informed of progress with specification development as a result of their input?                       | Stakeholder updates will be made as part of the formal consultation process |
| What level of wider public consultation is recommended by the CRG for the NPOC Board to agree as a result of stakeholder involvement? | 90 days   |

## Stakeholder/CRG Feedback

| Stakeholder/CRG Feedback  Englan |   |  |                        |                       |
|----------------------------------|---|--|------------------------|-----------------------|
| Organisation                     | Feedback Received   |  | SPWG response          | Resulting Action      |
| Responding                       |   |  |                        |                       |
| Fiona Reid<br>Central            | Is the <b>Scope</b> as outlined in the service specification clear? | No   |                        |                       |
| Manchester<br>Foundation         | If no please outline why  | Prolapse and incontinence are very common conditions.        | Agree                  |                       |
| Trust                            |   | This document clearly lays out the numbers of women who      | This part of the       | Service specification |
| Member of the                    |   | undergo primary surgery. If one considers the numbers        | service specification  | reviewed and updated  |
| CRG                              |   | presented in the document under the section titled           | will be updated to be  |                       |
|                                  |   | "Population needs" is apparent that the following conditions | clearer about surgical |                       |
|                                  |   | and treatments should fall in to specialised commissioning.  | procedures.            |                       |
|                                  |   | Procedures   |                        |                       |
|                                  |   | Secondary surgery for stress incontinence (less than 2500    | With regard to mesh    | Separate service      |
|                                  |   | per year )   | surgery, there will    | specification to be   |
|                                  |   | Recurrent prolapse surgery in the same compartment (less     | now be a separate      | developed for mesh    |
|                                  |   | than 4000 per year )   | mesh removal           | removal               |
|                                  |   | All mesh surgery for prolapse ( no more than 1000 per year)  | service specification  |                       |
|                                  |   | Excision of mesh   | and that will be       |                       |
|                                  |   | Surgery for DO (excluding Botox)                             | clearer about          |                       |
|                                  |   |  | complex and less       |                       |
|                                  |   | Conditions   | complex mesh           |                       |
|                                  |   | Aetiology of POP or SUI due to Congenital Reason             | removal                |                       |

|  | Combined faecal and urogynaecological conditions            |                         |             |
|--|---|-------------------------|-------------|
|  |   |                         |             |
|  |   |                         |             |
|  | No response   |                         |             |
|  | No response   |                         |             |
|  |   |                         |             |
| Is the Care pathway and clinical dependencies as outlined in |   |                         |             |
| the service specification clear?                             | It would be helpful if the specification outlined minimum   |                         |             |
|  | staffing standards in units                                 |                         |             |
| If no please outline why                                     |   | Specifying 3 is too     | No change   |
| in the product outline thry                                  | 3 Urogynaecologists   | restricitive but the    | 110 ondrigo |
|  |   |                         |             |
|  | 2 Colorectal surgeons                                       | main point is that it   |             |
|  | 2 Urology consultants                                       | should not be a         |             |
|  | 2 Specialist nurse (WTE 1.5)                                | single consultant unit  |             |
|  | 2 Specialist women's health physiotherapist (WTE 1.5)       |                         |             |
|  | , , , , , , , , , , , , , , , , , , ,                       |                         |             |
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|  |   |                         |             |
|  | My understanding is that in England there are about 180     |                         |             |
|  | institutes who provide gynaecological surgery. One would    | NHS England is to       |             |
| Please provide any further comments on the proposed          | anticipate about 25-35 institutes would provide specialised | carry out a review of   |             |
| service specification and/or outline proposed changes to     | services.   | the number of           |             |
| the document as part of this initial 'sense check'.          |   | institutes who are      |             |
| the decement as part of this initial sense eneck.            | If the amount action was a sumitted the group is a second   |                         |             |
|  | If the specification remains as written the numbers needing | carrying out specialist |             |

|                |  | treatment will more likely reflect those of a highly specialised | surgery. The            |
|----------------|--|--|-------------------------|
|                |  | service.   | intention is, once this |
|                |  |  | service specification   |
|                |  |  | has been agreed, to     |
|                |  |  | review providers        |
|                |  |  | against all of the      |
|                |  |  | service specifications  |
|                |  |  | and to be clearer       |
|                |  |  | about who can           |
|                |  |  | deliver specialised     |
|                |  |  | surgery. NHS            |
|                |  |  |                         |
|                |  |  | England is              |
|                |  |  | developing a            |
|                |  |  | commissioning           |
|                |  |  | framework to support    |
|                | Please declare any conflict of interests relating to this    |  | this work.              |
|                | document or service area.                                    |  |                         |
|                |  | The concept of regional networks for MDTs which refer in to      | Good that you agree     |
|                |  | centres, similar to the model used for gynaecological            | with the concept of     |
|                |  | cancer, is a good idea. However this will require resources to   | networks for MDTs.      |
|                |  | establish these.   | We do not envisage      |
|                |  |  | that this model will    |
|                |  | No response  | require resources –     |
|                |  |  | but it will require a   |
|                |  |  | new way of working      |
|                |  |  |                         |
|                |  |  |                         |
|                |  |  |                         |
| Section of     | Is the Scope as outlined in the service specification clear? | No   |                         |
| Female,        |  |  |                         |
| Neurological & |  |  |                         |
| Urodynamic     | If no please outline why                                     | Back in 2013/14 when we first began commenting on these          | The intention is to     |
| <u> </u>       |  |  |                         |

Urology service specifications we pointed out that this process is develop a single **British** fundamentally flawed due to the current service provision specification for Association of arrangements for recurrent and complex urinary complex surgery for Urological urinary incontinence incontinence. The existing documents are written by Surgeons gynaecologists for gynaecologists when, by common and vaginal and Responding on consent, the range of conditions referred to do not fall solely uterine prolapse and behalf of the within the ambit of uro-gynaecologists. Although to offer a service that **British** gynaecologists manage the majority of recurrent and is managed by Association of clinicians with complex prolapse, with very little of this work being Urological undertaken by urologists, the converse is true for recurrent appropriate expertise Surgeons and complex incontinence. In June 2014 in a letter to BAUS who can offer a Tony Smith, then Chairman of the Complex Gynaecology comprehensive range CRG and James Palmer, Clinical Director of Specialised of treatments and Services, acknowledged this and wrote regarding the surgical procedures combined specification for recurrent prolapse and recurrent within a multiincontinence that "this has proved to be challenging.... We disciplinary team have all agreed that this specification should be divided as structure and to be soon as possible and a considerable amount of work and clear about the MDT membership, progress has been made with this task". Now not only are we presented with a specification which still combines pathways and clinical recurrent prolapse and recurrent incontinence; urogenital dependencies. and anorectal conditions have been added in together with vaginal mesh removal. Complex vaginal mesh removal will be included in a separate specification The documents aims and ambitions remain unmet and it is Agree Service specification hard to see how commissioners with limited clinical updated knowledge could use it to properly structure a specialist

|  | service with reference to this document. For example the    |                       |                      |
|--|---|-----------------------|----------------------|
|  | definition of recurrent incontinence makes no sense -       |                       |                      |
|  | recurrent incontinence is incontinence following one        |                       |                      |
|  | previous failed appropriately performed procedure.          |                       |                      |
|  |   |                       |                      |
|  | BAUS would like to know what was the rationale for          | This specification is |                      |
|  | combining recurrent prolapse, recurrent incontinence,       | the result of         |                      |
|  | urogenital and anorectal conditions and vaginal mesh        | combining two         |                      |
|  | removal in one specification?                               | existing service      |                      |
|  | ·   | specifications into   |                      |
|  |   | one. The benefit of   |                      |
|  |   | doing this is to      |                      |
|  |   | ensure that women     |                      |
|  |   | across the country    |                      |
|  |   | are offered a more    |                      |
|  |   | comprehensive         |                      |
|  |   | service from          |                      |
|  |   | clinicians who have   |                      |
| Is the Care pathway and clinical dependent | ies as outlined   | the right support and |                      |
| in the service specification clear?        | es as outilited   | experience to deliver |                      |
| in the service specification clear:        |   | the best outcomes     |                      |
| If no please outline why                   |   | the best outcomes     |                      |
| ir no piease outline why                   | No  |                       |                      |
|  | No  |                       |                      |
|  |   |                       |                      |
|  |   |                       |                      |
|  | The care pathway, labelled 2.1 extends over 3 pages with a  | The care pathway      | Care pathway section |
|  | number of sub-headings and in general it is hard to follow. | section will be       | reviewed and made    |
|  | For example, under treatment strategy there is only         | reviewed and made     | clearer              |
|  | reference to "complex incontinence and prolapse", surely    | clearer and the       |                      |
|  | that should be "and/or prolapse" recognising that they      | terminology will be   |                      |
|  | often do not co-exist and can represent completely distinct | made consistent       |                      |
|  | entities. There is no mention of the other areas that are   |                       |                      |

|  | apparently covered by this specification.   |  |  |
|--|---|--|--|
| Please provide any further comments on the proposed service specification and/or outline proposed changes to | The Section on data management, audit and governance is particularly poor and it is often unclear whether the bullet points refer to all areas covered by the specification or to a specific area. Some points refer to prolapse surgery and others refer to "these procedures" or "such cases" without being specific as to what procedures or cases are being referred to.  | This part of the service specification will be reviewed and updated and will be clearer.                   | This part of the specification has bed reviewed and reworked |
| the document as part of this initial 'sense check'.  |   |  |  |
|  | The document lacks clarity and balance, is littered with ambiguity and unfortunately would not provide a useable template for commissioning a specialist service. Our readers had difficulty understanding the true tone or intent of the documents without reading between the lines. Perhaps the major reason for this is the lack of separation of the individual components. As mentioned above recurrent and complex incontinence is a separate entity from recurrent and complex prolapse and the document should reflect that. |  |  |
|  | BAUS would advise that a truly multi-disciplinary team be convened to define the core elements of these specialist services and that a final document would benefit from being written by someone with an appropriate expertise in commissioning in a clear house style.  | NHS England will update the service specification in line with the comments received and will welcome more |  |
|  | We would be willing to provide more detailed tracked  | detailed comments  |  |
| Please declare any conflict of interests relating to this  | comments on the document if that would be helpful.  | on the final document  |  |
| document or service area.  |   | that will be open to   |  |
|  |   | public consultation  |  |
|  | No response   |  |  |

| Theresa       | Is the Scope as outlined in the service specification clear? | Yes  |                   |                       |
|---------------|--|--|-------------------|-----------------------|
| Marshall      |  |  |                   |                       |
| Medtronic Ltd |  |  |                   |                       |
| Responding on | If no please outline why                                     |  |                   |                       |
| behalf of     |  |  |                   |                       |
| Medtronic Ltd | Is the Care pathway and clinical dependencies as outlined    | Yes  |                   |                       |
|               | in the service specification clear?                          |  |                   |                       |
|               |  |  |                   |                       |
|               | If no please outline why                                     |  |                   |                       |
|               |  |  |                   |                       |
|               | Please provide any further comments on the proposed          | Section 1.2, page 2, bullet point 1                            |                   |                       |
|               | service specification and/or outline proposed changes to     | "Women with urge incontinence who fail to respond to           |                   |                       |
|               | the document as part of this initial 'sense check'.          | Onabotulinium toxin A injections as a second line treatment    |                   |                       |
|               |  | or who withdraw from therapy due to side effects and still     |                   |                       |
|               |  | require further intervention such as ileocystoplasty (or other |                   |                       |
|               |  | bowel cystoplasty procedures)".                                |                   |                       |
|               |  |  |                   |                       |
|               |  | We suggest that "further intervention such as" examples        | Sacral nerve      | Service specification |
|               |  | include sacral nerve stimulation in line with NICE positioning | stimulation to be | update                |
|               |  | in the pathway for invasive treatments for overactive bladder  | made clearer with |                       |
|               |  | in women https://pathways.nice.org.uk/pathways/urinary-        | reference to the  |                       |
|               |  | incontinence-in-women#path=view%3A/pathways/urinary-           | existing NHS      |                       |
|               |  | incontinence-in-women/invasive-therapy-for-overactive-         | published policy  |                       |
|               |  | bladder-in-women.xml&content=view-node%3Anodes-                |                   |                       |
|               |  | <u>percutaneous-sacral-nerve-stimulation</u> . NICE states     |                   |                       |
|               |  | "consider percutaneous sacral nerve stimulation after MDT      |                   |                       |
|               |  | review if a woman's OAB has not responded to conservative      |                   |                       |
|               |  | management (including drugs) and botulinium toxin A".          |                   |                       |

|                |  |   |                       | <u> </u>      |
|----------------|--|---|-----------------------|---------------|
|                |  | We suggest and additional bullet point in this section for  |                       |               |
|                |  | sacral nerve stimulation for faecal incontinence as NHS     |                       |               |
|                |  | England also have a policy for this.                        |                       |               |
|                |  | Section 5: Applicable Service Standards                     |                       |               |
|                |  | We suggest and additional bullet after bullet 9 for NHS     |                       |               |
|                |  | England policy guidance on SNS for faecal incontinence.     |                       | As above      |
|                |  |   |                       |               |
|                |  | Medtronic manufacture and supply Sacral Nerve Stimulation   |                       |               |
|                |  | devices   |                       |               |
|                | Please declare any conflict of interests relating to this    |   |                       |               |
|                | document or service area.                                    |   |                       |               |
|                |  |   |                       |               |
|                |  |   |                       |               |
|                |  |   |                       |               |
|                |  |   |                       |               |
| Dr Rohna       | Is the Scope as outlined in the service specification clear? | No  |                       |               |
| Kearney,       |  |   |                       |               |
| Clinical Lead, |  |   |                       |               |
| Warrell Unit   | If no please outline why                                     | We consider women should be referred to specialist services | Service specification | Change to the |
| Central        |  | for recurrent stress incontinence after one previous        | change to cover this  | specification |
| Manchester     |  | procedure and for recurrent same site prolapse after one    |                       |               |
| Foundation     |  | previous procedure.   |                       |               |
| trust          |  |   |                       |               |
| Responding on  | Is the Care pathway and clinical dependencies as outlined    | Primary surgery including laparoscopic colposuspension and  | Agree                 | Change to the |
| behalf of the  | in the service specification clear?                          | autologous fascial sling is also specialised.               |                       | specification |
| Central        |  |   |                       |               |
| Manchester     | If no please outline why                                     | All mesh removal (abdominal and vaginal) except for vaginal | Agree and a separate  |               |
| Foundation     |  | trimming and recovering of minor vaginal extrusions should  | service specification |               |
| trust          |  | be referred.  | will now address this |               |

|  | Combined urinary/prolapse and fecal conditions should be included in the scope e.g urinary and fecal incontinence, pelvic organ prolapse and rectal prolapse.                        | Agreed  | See above Service specification has been updated |
|--|--|---|--|
|  | Congenital reasons for incontinence or prolapse should be included.  | This specification is related to the small number of women with incontinence and prolapse who will require complex and of invasive specialised surgical treatment | No change  |
|  | MDT should say urogynaecologist rather than a specialist gynaecologist and a urologist with specialised training in female reconstructive urology rather than a specialist urologist | Agreed  | Service specification updated                    |
| Is the care pathway and clinical dependencies as outlined in he service specification clear? |  |   |  |
| If no please outline why   |  |   |  |
|  | <b>Treatment strategy</b> : should say all patients who have had 1 failed continence procedure or same site prolapse   | Agreed  | See above  |

|   | recurrence.  |                         |                   |
|---|--|-------------------------|-------------------|
|   |  |                         |                   |
|   | All mesh removal (abdominal and vaginal)                       | Mesh removal will       |                   |
|   |  | have its own service    |                   |
|   |  | specification and the   |                   |
|   |  | service is likely to be |                   |
|   |  | delivered by a few      |                   |
|   |  | centres across the      |                   |
|   |  | country                 |                   |
|   |  |                         |                   |
|   |  |                         |                   |
| Please provide any further comments on the proposed       | Due to the predominance of mid-urethral tapes for treatment    | Agreed - See above      |                   |
| service specification and/or outline proposed changes to  | of stress incontinence there are fewer trained surgeons        |                         |                   |
| the document as part of this initial 'sense check'.       | available who can offer all surgical options including         |                         |                   |
|   | colposuspension and fascial slings. Therefore we feel repeat   | Repeat continence       | Change to service |
|   | continence surgery should be offered in specialised centres.   | surgery will be         | specification     |
|   | Patient choice of procedure will also play a role in referrals | offered only in         |                   |
|   | and many women are preferring to avoid a synthetic mid-        | specialist centres.     |                   |
|   | urethral tape. Women should be offered an alternative for      |                         |                   |
|   | primary surgery to a synthetic tape and this may necessitate   | The service             |                   |
|   | women being referred to specialist centres if local providers  | specification needs to  |                   |
|   | are unable to offer a choice.                                  | reflect a more          |                   |
|   |  | specialist MDT to       |                   |
|   | Dr Kearney and Dr Ward are clinical leads on NICE              | non-specialist MDT      |                   |
| Please declare any conflict of interests relating to this | guideline development committee for urinary incontinence       | relationship and        |                   |
| document or service area.                                 | update and pelvic organ prolapse.                              | description. Good       |                   |
|   | Dr Reid is a member of the CRG for Specialised Women's         | communication           |                   |
|   | Services   | between the services    |                   |
|   |  | is essential to enable  |                   |
|   |  | the appropriate         |                   |
|   |  | management of           |                   |
|   |  | referrals and advice    |                   |
|   |  |                         |                   |

|              |  |   | for non-specialist     |                       |
|--------------|--|---|------------------------|-----------------------|
|              |  |   | services               |                       |
| Tamsin       | Is the Scope as outlined in the service specification clear? | No  |                        |                       |
| Greenwell    |  |   |                        |                       |
| Consultant   | If no please outline why                                     | It does not have a standard pattern for the 3 disparate         | Scope to be made       | Service specification |
| Urological   |  | clinical areas included and concentrates significantly on       | clearer more broadly   | reviewed and made     |
| Surgeon UCLH |  | laparoscopic POP  | widened to be clear    | clearer               |
| and          |  |   | about the treatments   |                       |
| Chairperson  | Is the Care pathway and clinical dependencies as outlined    | No  | that fall under the    |                       |
| BAUS FNUU    | in the service specification clear?                          |   | service                |                       |
|              |  |   |                        |                       |
|              | If no please outline why                                     | There is no clear care pathway – a flow chart would be of       | The care pathway       | Care pathway section  |
|              |  | benefit.  | and the clinical       | has been reviewed     |
|              |  |   | dependencies will be   | and amended           |
|              | Please provide any further comments on the proposed          |   | reviewed               |                       |
|              | service specification and/or outline proposed changes to     |   |                        |                       |
|              | the document as part of this initial 'sense check'.          |   |                        |                       |
|              |  | A lot of the document is cut and pasted from the previous       | Agreed the             | As above              |
|              |  | document – with no uniform pathway, style or clarity.           | specification needs to |                       |
|              |  |   | be clearer and more    |                       |
|              |  | Numbers are plucked from the air and changed from one           | consistent             |                       |
|              |  | part of the document to the next.                               |                        |                       |
|              |  | It is not a pathway at all but simply concentrates on rare      | Pathway section will   | As above              |
|              |  | procedures – this is not holistic and it would be far better to | be reviewed            | 713 45070             |
|              |  | revise the 2 previous documents which detailed patient          | be reviewed            |                       |
|              |  | pathways and for a 3rd document for mesh revision surgery       |                        |                       |
|              |  | (which can be both vaginal mesh and abdominal) which is         |                        |                       |
|              |  | simply listed as a throw away sentence in this specification.   |                        |                       |
|              |  | Simply insteads a unlow away semence in uns specification.      |                        |                       |
|              |  | No urologists were involved or consulted during the             |                        |                       |
|              |  | production of the specification which completely destroys the   | This will be           |                       |

|                 | Please declare any conflict of interests relating to this    | MDT nature of the document                                   | addressed          |                       |
|-----------------|--|--|--------------------|-----------------------|
|                 | document or service area.                                    |  |                    |                       |
|                 |  |  |                    |                       |
|                 |  |  |                    |                       |
| Roderick Teo    | Is the Scope as outlined in the service specification clear? | Yes  |                    |                       |
| (Lead for       |  |  |                    |                       |
| Urogynaecolog   | If no please outline why                                     |  |                    |                       |
| у)              |  |  |                    |                       |
| University      | Is the Care pathway and clinical dependencies as outlined    | Yes  |                    |                       |
| Hospitals of    | in the service specification clear?                          |  |                    |                       |
| Leicester NHS   |  |  |                    |                       |
| Trust,          | If no please outline why                                     |  |                    |                       |
| Urogynaecolog   |  |  |                    |                       |
| y Unit          | Please provide any further comments on the proposed          | None   |                    |                       |
| Responding on   | service specification and/or outline proposed changes to     |  |                    |                       |
| behalf of       | the document as part of this initial 'sense check'.          |  |                    |                       |
| University      |  |  |                    |                       |
| Hospitals of    | Please declare any conflict of interests relating to this    | None   |                    |                       |
| Leicester NHS   | document or service area.                                    |  |                    |                       |
| Trust,          |  |  |                    |                       |
| Urogynaecolog   |  |  |                    |                       |
| y Unit          |  |  |                    |                       |
| Jane Denton     | Is the Scope as outlined in the service specification clear? |  |                    |                       |
| Multiple Births |  |  |                    |                       |
| Foundation      | If no please outline why                                     | From the patient perspective it would be preferable to be    | Agreed . See above | Service specification |
| Replying as     |  | referred for assessment by the MDT after one failed          |                    | changed               |
| PPI member of   |  | incontinence or prolapse repair procedure. Although this     |                    |                       |
| Specialised     |  | would increase the number of referrals it should be the more |                    |                       |
| Women's CRG     |  | complex cases as presumably this was the reason for the      |                    |                       |
|                 |  | first failed procedure. It could reduce the number of those  |                    |                       |
|                 |  | needing surgery repeated with the associated risks and       |                    |                       |
|                 |  | costs and equally importantly could reduce the time women    |                    |                       |

|   | are coping with these often debilitating and stressful      |          |
|---|---|----------|
|   | conditions.   |          |
|   |   |          |
|   |   |          |
|   | However I appreciate that there may be clinical reasons for |          |
|   | the proposed referral protocols which I may have missed.    |          |
|   |   |          |
|   |   | ļ        |
|   |   |          |
|   |   |          |
| Is the Care pathway and clinical dependencies as outlined |   |          |
| in the service specification clear?                       |   |          |
|   |   |          |
|   |   |          |
| If no please outline why                                  |   |          |
|   |   |          |
|   | The proposal for regional networks and MDT is an excellent  |          |
|   |   |          |
| Please provide any further comments on the proposed       | idea but it will need the commitment and resources to       |          |
| service specification and/or outline proposed changes to  | establish them effectively.                                 | As above |
| the document as part of this initial 'sense check'.       |   |          |
| ·   |   |          |
|   |   |          |
|   | I have no conflicts of interest                             |          |
| Please declare any conflict of interests relating to this |   |          |
| document or service area.                                 |   |          |
| accument of software around                               |   |          |
|   |   |          |
|   |   |          |
|   |   |          |