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Claire Ferguson
Scottish Government
Directorate General Health and Wellbeing
Area 2E(N)
St Andrews House
Edinburgh
EH1 3DG

Dear Ms Ferguson

Re: Scottish Government consultation on Local Healthcare Bill

fpa (Family Planning Association) is the UK's leading sexual health charity, working to enable people in the UK to make informed decisions about sex and to enjoy their sexual health free from oppression, exploitation or physical or emotional harm. Through our activity, including our community based sex and relationships education projects, we have contact with members of the public and service users on a daily basis.

We broadly welcome the proposals included in the consultation on the Local Healthcare Bill to ensure that health services are accountable and responsive to their local populations. However, it is important to recognise that there will be some elements of healthcare which people may be unwilling to talk about in public. The changes to the membership of NHS Boards must not be detrimental to those services. The stigma and embarrassment that continue to surround sex, sexually transmitted infections, contraception and abortion mean that many people are unwilling to discuss their experiences and the services that they need. This can mean that the actual need for services is not clear.

It is vital that service provision is based on actual need, which should be determined by high quality research and comprehensive needs assessment, not just focused on those services for which there appears to be vocal demand. Any new arrangements to increase local accountability must ensure that a variety of views are reflected and that much needed services are not put at risk because of a lack of local campaigning or a perceived lack of local need. This may involve innovative approaches to seeking input, for example through anonymous feedback exercises and contact with organisations such as fpa, which can provide a consumer point of view.

fpa is keen that the proposed changes to the membership of NHS Boards leads to improved services throughout Scotland. Local representatives on NHS Boards, including those who are elected, should be able to represent a variety of ethical and moral viewpoints. It is important that people with strong views are not able to restrict or unduly influence service provision. For example, people with certain ethical views may well wish to impose restrictions on abortion services or fertility services. It is important that the new arrangements recognise the complexity of securing representative local involvement and ensure that the new structures truly are responsive.

fpa welcomes the opportunity to comment on the proposals for the Local Healthcare Bill. Please do not hesitate to contact us should you have any queries about our response.

Yours sincerely,

Sent by email

Audrey Simpson
fpa Director of Scotland