

25.01.21

The Hillingdon CCG has published the following misleading and factually incorrect information on their website on 22.1.1.2021

<https://www.hillingdonccg.nhs.uk/news-publications-events-2/news/nhs-england-decision-not-approve-west-london-medical-centre-and-church-road-surgery-primary-care-vaccination-centres>

We wholly disagree with the contents. In our opinion, what they have written in the release is misinformation. In particular, we have not refused to work with local practices, we are always happy to work with colleagues and practices within the frame work of data protection regulations; Hillingdon CCG refused to support our application and cancelled the designated site visit which was organised by it's own senior managers and senior managers at NWL collaboration of Clinical Commissioning groups in consultation with NHSE . Further, we are able to carry out the required vaccinations per week. Wastage is no longer a concern with Oxford vaccines but we had additional measures in place to stop wastage of Pfizer vaccine. We have been blocked unacceptably, unnecessarily and wrongly.

CCG says

Patients may have read that the West London Medical Centre and Church Road Surgery have not been accredited as COVID vaccination centres by NHS England and that the practices are campaigning against this decision.

Response:

For clarity – following the submission of our application to provide the vaccination service, the decision was taken by the CCG to conduct a site visit on 29.12.2020. This decision was made by NHS Hillingdon CCG in consultation with NHS England. This site visit was later cancelled without explanation by the CCG but with assurance that this would take place. We were told we would be contacted as to when this would take place. It has still not happened. We understand the decision by NHS England not to approve the site visit relates to the position of the CCG set out in their letter dated 06 January 2021 (The points in this letter was that they would not support because 1. Only PCNs can apply 2. Group practices were unable to deliver 975 per week 3. Not enough assurance received that we will open longer hours to vaccinate). We did not agree with the points raised in that letter and have since responded to each point to clarify why we are in a position to provide the COVID vaccination service and meet its requirements. Unfortunately, NHS England can only approve the site, based on the recommendation of the CCG. But since the CCG is blocking us and hasn't bothered visiting our safe practice, we are left unable to conduct the vaccination programme.

CCG says

The CCG is taking steps to ensure that the patients in that practice are not disadvantaged and can make use of the same vaccination centres as all other Hillingdon residents. Patients will have a choice of nearby locations where they can be vaccinated.

We wanted to be clear on why West London Medical Centre and its partner practice Church Road Surgery have not been accredited as vaccination centres.

The COVID vaccination process is one of the most ambitious vaccination programmes in the history of the NHS. A huge amount of planning has gone into it and NHS England has worked out that the quickest and most effective approach is for all GPs to work together in local networks, alongside a national programme of mass vaccination centres. This means every general practice working with the neighbouring practices in its Primary Care Network (PCN) and each PCN working together.

Response:

We wholly disagree with this assertion. The service specification specifically states that the GP practices can apply as a 'PCN grouping' which it specifically defines as "the group of GP

practices which collaborate to deliver the services under this ES, which may include established Primary Care Networks, and additional neighbouring GP practices and/or other groups of GP practices working together.

In our case, West London Medical Centre and Church Road Surgery are the 2 non-PCN practices within CCG and are working together as a "PCN Grouping". It is specifically not limited just to PCNs, but includes groups of practices, which is why we applied. In fact, the COVID specification (Enhanced Service or "ES") specifically states: "A GP practice need not be a member of an established Primary Care Network to participate in this ES."

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CCG says:

The aim is to get as many people as we can vaccinated as quickly as possible, with no vaccine wasted. Criteria for vaccination centres published by NHS England focus on mutual support, collaboration and sharing of resources between centres, so that the maximum number of patients are vaccinated with no waste. This means each vaccination centre needs to be a shared resource locally – no practice is only vaccinating its own patients.

West London Medical Centre and Church Road Surgery are proposing the Church Road site to become the vaccinating site. There will be no wastage.

West London Medical Centre and Church Road Surgery have refused to be part of a PCN or to work with local PCNs, which is a key requirement for vaccination centres.

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Response:

Taking part in a PCN is voluntary and the CCG is well aware that both practices are not part of a primary care network and haven't been since its inception in April 2019. As noted above, the service does not require practices to be part of a PCN in order to vaccinate patients – merely to collaborate with other practices, which is what we have asked to do. The agreement to participate in the COVID service is an agreement between each individual practice and NHS England with a delivery model that requires collaboration – which we have agreed to do as between both practices. We are disappointed that the CCG is not seeking to support us after having initially arranging the site visit. We are at a loss to understand why there has been a change in stance, as this is now causing the delay in vaccinations. Effectively we are being blocked because the CCG is refusing to listen to our responses and is acting against us, not with us.

CCG says:

They were also unable to perform the required 975 vaccines a day

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Response:

Performing 975 per day was never a requirement for any centre or site. NHS England asked whether sites have **capacity** to do a minimum 975 per **week**.

The guidelines state: "PCN groupings are asked to also provide (to help with local planning) an indicative number of vaccinations they believe the site will be able to deliver each week (sites will not be held to this number), recognising that the minimum number required is 975 vaccinations per week. This document was produced in November 2020, in preparation to delivery of Pfizer vaccine which came in a 'pizza box' of 975 doses with a shelf life of one week when kept in a normal pharmacy fridge at 2-8 degrees.

The introduction of the Oxford vaccine altered this requirement as it can be kept in a normal fridge for up to 6 months. Wastage is no longer a concern. We confirmed in writing that we could comply with that capacity. In December 2020, we told the CCG we could build capacity to deliver 975, if needed.

On 8.1.2021, after the rollout of Oxford vaccine which happened on 4.1.21, we wrote to the CCG explaining that the practices were able to build the capacity to deliver 1000 a week, if needed. In December 2020, we told the CCG that our Grouping did not have 975 patients within our initial cohort of patients that was proposed (the above 80's) at that time. We were proactive and even obtained a ultra-low temperature freezer to store Pfizer vaccine at minus 70 to avoid wastage. The National Medical Director's office at NHS England congratulated us for our enthusiasm and advised us to contact the CCG for smaller packs of 75 to suit our patient population. CCG refused.

It is the CCG which has not agreed to allow us to do this.

The ability to provide 975 vaccine doses in a week was never an enhanced services specification. Please visit [version 3.published on 7.1.2021](#)

CCG says

...and were not able to provide sufficient assurance that Church Road Surgery could vaccinate patients 7 days a week from 8am-8pm.

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Response:

We strongly and robustly disagree with this statement - in fact we gave firm reassurances. We specifically stated to the CCG that we will open every day, including bank holidays 8am to 8pm. The CCG have not given any indication of what "further reassurance" they require.

CCG says:

While this is a decision taken by NHS England, it is one that the CCG fully supports.

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Response:

NHS England have made a decision based on what the CCG told them. The CCG should have visited us on 29.1.2020 after which it should have sent a full report with sections 1, 2 & 3 of the application form completed. Since the CCG cancelled the visit without good reason, it was not in a position to complete sections 2 and 3. We believe an incomplete application was sent to NHSE making it impossible for NHSE to make an objective judgement.

We are concerned that the position being stated [here](#) is not an accurate reflection of what happened. It is entirely misleading.

In summary, we say:

For the reasons above, we believe that the CCG's reasoning is incorrect, doesn't reflect the latest requirements of the COVID specifications and gave NHS England, the Prime Minister/our constituency MP, and our patients a misleading account.

Further delay on this issue can only put our patients at risk and we believe that we are in the best position to mobilise and to start vaccinating our patients.

End of response