Bliss response to Fair and transparent pricing for NHS services - A consultation on proposals for objecting to proposed pricing methodology

21 December 2012

Bliss is the UK charity dedicated to ensuring that premature and sick babies survive and go on to have the best possible quality of life. We provide practical and emotional support to families, provide specialist study days and training to support doctors and nurses to develop their skills, and campaign for essential change within government and the NHS.

Bliss broadly agrees with the proposals that have been set out around quantifying the objection process to tariffs: that service providers should count towards the thresholds; that financial accounts should be used to calculate total tariff income; and that share of supply should be calculated across all services covered by the tariff in force.

We recommend that the objection thresholds for commissioners, providers, and share of supply should be 50% rather than 51% as stated in the consultation, to recognise that any majority figure is enough to trigger a review.

We would also suggest that, in line with the focus on patient and public engagement, the Department of Health, Monitor and the NHS Commissioning Board consider developing a threshold of public and patient objections that would also trigger a review.

In terms of highly specialised services, we would highlight that under these guidelines a very small number of providers who provide the majority of a nationally delivered service could very easily force objections, and that measures need to be taken to ensure complete transparency and avoid cartel-like behaviour.

Finally, Bliss would like to take this opportunity to urge the NHS Commissioning Board and Monitor to develop a national tariff for neonatal services which takes full account of the standards in the Toolkit for High Quality Neonatal Services and NICE quality standards for neonatal care to ensure the consistent delivery of the highest quality care to premature and sick babies and their families.