

NHS England is consulting on changes to the assurance framework for clinical

With local authority social care departments experiencing deep cuts, this not only increases the chances of people needing more, avoidable, acute healthcare, but also limits the ability of hospitals to discharge people home in a timely manner. We welcome reference to the latter issue in the proposed indicators, but we strongly reiterate the need for urgent action on resolving the crisis in social care being experienced by older people.

3. Equality and human rights

We are concerned that the current framework does not reference duties under the Equality Act 2010, including the public sector equality duty. CCGs are necessarily subject to all duties in the act, but we believe these need to be explicitly stated in the framework and be included in the metrics under the requirements for being -le

progress. It risks reducing access to essential services and may do little to address the underlying causes of this inequality such as the broader impact of poverty and the lower relative provision of primary care services. The terminology is also unhelpful in the light of points made under