

Llais,  
33-35 Heol y Gadeirlan,  
Caerdydd,  
CF11 9HB

Llais,  
33-35 Cathedral Road,  
Cardiff,  
CF11 9HB



29 November 2023

By email only: [stephen.harry@wales.nhs.uk](mailto:stephen.harry@wales.nhs.uk)

Dear Stephen

## EMRTS SERVICE REVIEW

I write following our recent helpful discussions about some of our concerns surrounding Phase 2 of the EMRTS service review. We are grateful to you for your continued commitment to work with us, and to reflect and respond to the matters we raise.

As we discussed when we last met, it is unfortunate that we were not provided with the chance to work with you on the development of the Phase 2 public engagement programme and documentation before it was agreed and published. I want to thank you for acknowledging this and acting in response, e.g., taking action to extend the engagement period by a further week and publishing more information on your website.

We are also grateful for your offer to put right incorrect references to Llais in the documentation.

In this spirit of co-operation and, recognising the considerable effort you and your team have put into engaging with, informing, and involving people and communities about this service review so far, we set out below our remaining key concerns along with our suggested next steps.

Cadeirydd / Chair: **Athro / Professor Medwin Hughes DL**  
Prif Weithredwr / Chief Executive: **Alyson Thomas**  
E-bost / E-mail: **enquiries@llaiscymru.org**  
Ffôn / Tel: **02920 235558**

Llais,  
33-35 Heol y Gadeirlan,  
Caerdydd,  
CF11 9HB

Llais,  
33-35 Cathedral Road,  
Cardiff,  
CF11 9HB



Importantly, we think that the second phase of engagement showed your desire to work with people and communities when developing this important service. Working in partnership with communities in this way shows a commitment to develop proposals together in a co-productive way.

Service developments that are planned in this way are more likely to respond to what matters most to people about their services and to deliver identified improvements.

However, we think that the intention following the end of the Phase 2 engagement to move straight to identifying and evaluating a final set of refined options, and deciding on a preferred option without providing a further opportunity for people to think about and respond to those final refined options does not match that commitment.

It was our understanding and expectation that the publication of the Phase 2 report would take forward and develop the ideas shared in Phase 1 to allow further consideration of feedback on a range of identified options. We expected to work with you at the end of that stage to review the outcome of the 2-phase engagement process and discuss next steps, including the need for a public consultation stage.

We think further public involvement through a formal public consultation is necessary and proportionate, given the highly sensitive nature of this issue, before any final decision is taken. Such a consultation needs to focus on the realistic options that can be developed from the Phase 1 and Phase 2 feedback gathered.

We believe that moving straight to a decision following Phase 2 without a public consultation is wrong for some important reasons, set out below.

Cadeirydd / Chair: **Athro / Professor Medwin Hughes DL**  
Prif Weithredwr / Chief Executive: **Alyson Thomas**  
E-bost / E-mail: **[enquiries@llaiscymru.org](mailto:enquiries@llaiscymru.org)**  
Ffôn / Tel: **02920 235558**

Llais,  
33-35 Heol y Gadeirlan,  
Caerdydd,  
CF11 9HB

Llais,  
33-35 Cathedral Road,  
Cardiff,  
CF11 9HB



1. the purpose of the Phase 2 engagement exercise was not sufficiently and consistently clear. For example:
  - in the Chief Ambulance Services Commissioner's report, in the Decision Making and Next Steps section, it clearly says that "Phase 2 seeks public comment on the options developed from 9 October 2023 – 5 November 2023."
  - In the Phase 2 plain language version of the Chief Ambulance Services Commissioner's report, the document's title says, "We want to know what you think about what you told us in Phase 1". In the 'Tell us what you think' section, it says "tell us what you think about how we have listened to what you wanted. It will help us decide what to do next."
  - In the Phase 2 public engagement slides, it says "It's important that I now.....
    - Check what you told me
    - Clarify any queries you may have
    - Seek comments on Chief Ambulance Services Commissioner's report."

We think this may have affected people's decisions about whether to get involved in this important second phase of engagement. We believe that the language and process to date would lead the public to reasonably believe that there would be further opportunity to comment and engage before any final decision is made.

Unfortunately, as we did not have any opportunity to comment upon the Phase 2 report before publication there was an opportunity lost to ensure

Cadeirydd / Chair: **Athro / Professor Medwin Hughes DL**  
Prif Weithredwr / Chief Executive: **Alyson Thomas**  
E-bost / E-mail: **enquiries@llaiscymru.org**  
Ffôn / Tel: **02920 235558**

Llais,  
33-35 Heol y Gadeirlan,  
Caerdydd,  
CF11 9HB

Llais,  
33-35 Cathedral Road,  
Cardiff,  
CF11 9HB



that the language and intentions were clear. In any event, it had been our understanding that there would be further opportunity to discuss next steps with you following the end of the phase 2 engagement, including discussion on a need for further public involvement prior to final decision making.

2. Although the Phase 2 engagement documents recognise that some of the options will cost more money than others, there is no detailed information about the estimated costs of the options identified in the documents.

You have been clear in your commitment that the formal engagement process would:

- Describe how EMRTS works now
- Agree the 'rules' for comparing different options
- Present the benefits, risks, and impact of each option.

Because the presentation of the benefits, risks and impact of each option does not include estimated costs, we do not believe people have had a meaningful chance to think about and evaluate the different options taking into consideration all the important information.

Having some idea of the likely costs of the different options could make a real difference in what people think about which option/s are best.

3. We do not believe that it will be clear to the public what in fact are the realistic options being considered. Whilst various options have been identified the documents lack clarity as to which options are realistically available for consideration when a decision is being made because:

Cadeirydd / Chair: **Athro / Professor Medwin Hughes DL**

Prif Weithredwr / Chief Executive: **Alyson Thomas**

E-bost / E-mail: **enquiries@llaiscymru.org**

Ffôn / Tel: **02920 235558**

Llais,  
33-35 Heol y Gadeirlan,  
Caerdydd,  
CF11 9HB

Llais,  
33-35 Cathedral Road,  
Cardiff,  
CF11 9HB



- The language used is interchangeable, with references to options and scenarios followed by modelled options which could be confusing for members of the public.
- The options are not sufficiently narrowed down to allow the public to properly evaluate and comment upon them.
- The benefits, risks and impact of each option is not clearly set out.

A formal public consultation would provide a chance to set out clearly how public involvement has shaped the development of a set of final, narrowed down options, in line with the current guidance on engagement and consultation. It will provide a chance to:

1. Give a clear picture of the financial implications of the different options.
2. Spell out who will be affected by the proposed changes and how their interests are being protected.
3. Explain any risks and how they will be managed.
4. Explain how any change and benefit will be evaluated after implementation.
5. Engage in a broader range of ways throughout Wales, not just in the specific areas where concerns have been raised.

As expected, we would be happy to work together with you in planning the public consultation so that the people and communities affected across Wales have an equitable chance of having their say at this key stage in the development process.

In line with the Statutory Guidance on Representations Made by the Citizen Voice Body, we trust you will have regard to our proposals. If in your view the proposals are not an appropriate way forward, we look forward to receiving confirmation of your reasons for that view.

Cadeirydd / Chair: **Athro / Professor Medwin Hughes DL**

Prif Weithredwr / Chief Executive: **Alyson Thomas**

E-bost / E-mail: **enquiries@llaiscymru.org**

Ffôn / Tel: **02920 235558**

Llais,  
33-35 Heol y Gadeirlan,  
Caerdydd,  
CF11 9HB

Llais,  
33-35 Cathedral Road,  
Cardiff,  
CF11 9HB



Eich llais mewn iechyd | Your voice in health  
a gofal cymdeithasol | and social care

We look forward to hearing from you.

Yours sincerely

A handwritten signature in black ink that reads 'J A Thomas'. Below the signature is a single horizontal line.

Alyson Thomas  
**Chief Executive**

Croesewir gohebiaeth yn y Gymraeg a'r Saesneg. Os byddwch yn ysgrifennu atom yn Gymraeg, byddwn yn ateb yn Gymraeg. Ni fydd hyn yn arwain at oedi wrth ymateb i'ch gohebiaeth.

We welcome correspondence in Welsh and English. If you write to us in Welsh, we will answer in Welsh. This will not lead to a delay in responding to your correspondence.

Cadeirydd / Chair: **Athro / Professor Medwin Hughes DL**  
Prif Weithredwr / Chief Executive: **Alyson Thomas**  
E-bost / E-mail: **[enquiries@llaiscymru.org](mailto:enquiries@llaiscymru.org)**  
Ffôn / Tel: **02920 235558**