

PUBLIC BOARD PAPER HA09/021 MEETING – 26 FEBRUARY 2009

Water fluoridation consultation process

2008/9 Annual Plan key area of responsibility to which the paper relates (please mark in bold):				
Health and Well-Being / Inequalities	Improve Clinical Standards	System Reform	Workforce and Capability	SHA Leadership
Finance	Information Technology-Enabled Transformation	Knowledge Management	Governance	Performance
Links to SCSHA Risk Register / Board Assurance Framework (please complete):				
Risk Register Reference	4.2			
Risk Description	Failure to conduct an open and transparent water fluoridation consultation process to enable the SHA Board to make an informed decision.			

Legal Implications (if any)	
<ul style="list-style-type: none"> The original consultation plan and document was reviewed prior to consultation by SHA solicitors who confirmed that the process, plan and document were compliant with the Water Fluoridation (Consultation) (England) Regulations 2005. 	
Equality and Diversity Implications (if any)	
<ul style="list-style-type: none"> The consultation plan and document were assessed prior to consultation against Equality Impact Assessment processes. 	
Links to partnership working / public engagement (if any)	
<ul style="list-style-type: none"> This paper outlines the activity undertaken as part of the largest public consultation carried out so far by SCSHA. The lessons learned through this process will be used in future public engagement exercises. 	

Key Issues and Points for Discussion:

- The water fluoridation consultation is the largest public consultation carried out by South Central SHA with over 10,200 formal responses during the consultation period.
- Given the importance of the issue the SHA carried out the consultation over 14 weeks.
- To raise awareness of the consultation and to generate responses, adverts were placed in key local newspapers each month reaching over 293,000 people according to independent figures.
- The SHA provided a variety of different mechanisms to enable those wishing to respond to the consultation to do so easily.
- Over 350 working hours were spent by SHA staff in Southampton and south west Hampshire at public events during the consultation.
- The consultation feedback form was sent to over 110,000 households in the local area – this generated almost a quarter of all responses to the consultation.

Actions requested from / recommendations to the SHA Board:

- To note the contents of this paper and the activities taken as part of the water fluoridation public consultation.

Author(s) of paper:

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Responsible Lead Director(s) who has signed off this paper:

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Other committees / groups where this paper / item has been considered:

None.

Date of paper:

18 February 2009

Introduction

The public consultation into proposals to add fluoride to the water supply in parts of Southampton and south west Hampshire, began on 8 September and closed on 19 December 2008. Given the nature of the issue being consulted on, the SHA sought to provide local people with as much opportunity as possible to share their views. It was therefore agreed prior to consultation that the SHA would carry out the consultation for longer than the 12 week minimum.

Over 350 working hours were spent by the SHA staff in the area covered by the proposal during the course of the consultation, providing opportunities for local people to seek information from the SHA. The time was spent at a series of 'drop-in' events, Questions Time style discussions, and meetings with stakeholders. During the consultation there were over 4,000 unique visits to the SHA website and over 10,000 formal responses were received.

Although individual members of SHA staff, from a personal or professional point of view, may support water fluoridation, the SHA has a corporate responsibility to carry out an objective assessment of the consultation responses. The SHA has remained objective throughout this process and commissioned independent expert support in undertaking an objective analysis of responses.

Awareness raising activity

As part of any public consultation it is important that members of the public are aware of the consultation taking place and are able to make a choice about whether they wish to respond to it.

Prior to the consultation members of staff from the SHA met with key local stakeholders to keep them informed of plans for consultation. Stakeholders included:

- Local Authorities
- Local MPs
- Local Dental Committee
- Southern Water
- Water Voice Southern – the consumer group for water users

Stakeholders were informed of the start of the consultation and provided with relevant material including the consultation document.

The Chief Executives of the large employers across the local area were also contacted and provided with material to raise awareness of the consultation amongst their staff. Publicity material was also displayed in high traffic locations such as libraries, GP practices, dental practices and shops.

To generate awareness the SHA published adverts in two local newspapers in September, October, November and December along with two adverts in the

local Polish newspaper Polksi Glos. According to independent figures collated by the Joint Industry Committee for Regional Press Research, 293,000 people in the local area will have read a newspaper featuring an advert informing the public about the consultation.

The SHA also carried out extensive media relations activity liaising with local journalists, responding to enquiries and issuing updates on the consultation through press releases. Over the consultation period, 11 press releases were issued keeping the local media informed about the status of the consultation. Keeping the local media proactively informed minimised the number of media enquiries received (28 in total). SHA spokespeople carried out 19 broadcast interviews with radio and TV media. On the occasions where the SHA had cause to rebut inaccurate claims or articles carried in local newspapers, the inaccuracies predominantly centred on confusion on the role of the SHA compared to the PCT role and a perception that the outcome of the consultation was decided prior to the end of consultation.

A mail drop of the consultation feedback form to 110,000 households in the local area was also carried out one month before the end of the consultation to encourage further responses from local people. In the space of four weeks, the mail drop generated almost a quarter of all responses to the consultation.

Responding to the consultation

The SHA provided various opportunities for people to respond to the consultation including via the SHA website, email, Freepost address and mail-drop. Alongside these mechanisms a free phone number was set up to allow people to request information. Over 10,200 formal responses to the consultation were received.

Drop-in events

Nine 'drop-in' events were held across the local area in community locations. These sessions ran from 12noon – 8pm and gave local people the chance to ask questions and find out information about water fluoridation and the consultation from clinical and non-clinical staff. Approximately 326 attendances at these sessions with some people attending a number of the events.

A proportion of the people attending these events attended one or more of the drop-in sessions and as a result this presented people with an opportunity to submit more than one response to the consultation.

Question Time events

Three separate Question Time style events were held and these were chaired independently by BBC broadcaster and Hampshire resident Peter White.

These events featured a panel of speakers representing local and national organisations on both the pro and anti fluoridation sides of the debate. Representatives included:

- Chief Dental Officer for England at the Department of Health

- Consultant in Dental Public Health at Southampton City PCT
- Representative from Hampshire Against Fluoridation
- Representative from the National Pure Water Association

The intention was for these sessions to provide local people with the chance to ask questions of the panel regarding the issue of fluoridation. The events were attended by a total of almost 400 people.

All Question Time events were filmed and made available via the SHA website to give anyone who was unable to attend a session the opportunity to watch the debate. Strong views were expressed at the sessions and on occasion the events proved challenging to chair.

Phone poll

Experience shows that some sections of the community are less likely to respond to a public consultation than others i.e. those in lower socio economic groups. The SHA therefore commissioned ICM Research to carry out a phone poll of 2,000 people in the area covered by the proposal.

The survey was based on a quota sample with ICM Research setting geo-demographic quotas on variables including age, gender, work status and ethnicity to ensure the composition of achieved interviews matched the known profile of Southampton and those areas affected in Hampshire.

Most national polling takes place on sample sizes of 1,000 people; however the SHA was keen to use a larger sample size to capture more views. The SHA was also keen to ensure any questions developed were not considered to 'lead' respondents to a specific answer; therefore questions for the survey were developed with input from representatives of Hampshire Against Fluoridation and Southampton City PCT.

During the consultation some members of Hampshire Against Fluoridation expressed concerns that the SHA was not doing enough to raise awareness of the consultation with the majority of local residents unaware of the consultation taking place. The Board should be reassured by the results of the phone poll which shows that two thirds of the population were aware of the consultation taking place.

Board paper HA09/023 sets out the results of the phone poll in full detail.

Participation in Local Authority review processes

As part of the process for reviewing the water fluoridation proposals a number of the local authorities in the area covered by the proposed scheme conducted reviews inviting campaign groups, health experts and other representatives to answer questions put forward by councillors.

The conclusion of the review process was then used by each Local Authority to recommend a position on the proposal to their full council. Public Health experts from the SHA attended a number of these review sessions to answer questions on the proposal. A detailed breakdown of responses by local

authorities is set out in a separate paper prepared by the independent analyst (Board paper HA09/022).

Health Gateway Review process

A Gateway Review is an independent 'peer review' process for projects or programmes at key stages of their lifecycle. The aim of a review is to provide assurance to Senior Responsible Owners that the project can progress successfully to the next stage and is considered best practice in the public sector.

Although a Gateway Review was not formally required for this consultation, the SHA was keen to learn whether, mid-way through the consultation, there were any issues which should be addressed before the end of the consultation.

As part of the Gateway Review process, independent reviewers met with key stakeholders connected to the consultation. The review highlighted a small number of areas where actions were identified to improve the implementation of the project. Areas included maximising the return of completed feedback forms, identifying targets for the remainder of the consultation and defining organisational boundaries and roles for onward communication with stakeholders.

In response to the consultation the consultation team took a number of actions in line with the view expressed in the Gateway Review. The issues identified will be used to inform future public engagement activities.

Correspondence since the end of the consultation

Since the end of the consultation on 19 December the SHA has received correspondence from members of the public both inside and outside of the area covered by the proposal. The majority of this correspondence has been targeted at SHA Board members.

The SHA has treated emails expressing support or opposition received after 19 December consistently by logging them but excluding them from the consultation feedback. 154 emails/letters have been received (as at 17 February 2009) and logged by the SHA since then but do not form part of the consultation feedback report.

Conclusion

Prior to the consultation the SHA outlined a number of objectives for the water fluoridation consultation. The objectives and the achievement of them is set out below:

Objective	Achievement
<p>To ensure enough mechanisms are in place to provide opportunities for those living and working in Southampton and south west Hampshire to have their say on the proposals and offer opportunities for genuine involvement in the process</p>	<p>The SHA set out numerous mechanisms for local people to have their say on the proposals.</p> <p>The SHA carried out more activity than that set out in the Water Fluoridation (Consultation) (England) Regulations 2005.</p> <p>Over 10,000 formal responses were received to the consultation.</p> <p>Activity has taken place which provided both pro and anti fluoridation groups to have their say on proposals and for them to share their views with local people.</p>
<p>Following an effective public consultation, the results can be independently analysed by an independent organisation so that the arguments put forward either for or against the proposal can be assessed for the cogency of the argument being made</p>	<p>This objective has been achieved as a process of independent analysis has taken place.</p>
<p>To raise awareness of the issue of fluoridation amongst the population in Southampton and south west Hampshire so that at the end of the consultation more people are able to express a view on the issue. The SHA will be using the results of the Public Perception Market Research carried out by ICM Research during January – March 2008 as a baseline</p>	<p>Independent figures show that two thirds of local people were aware of the fluoridation consultation.</p> <p>Comparing the February 2008 research against that of the telephone survey carried out in December, in February 30% of the population said were unable to express an opinion on whether fluoride should be added to the water supply. In December 2008 that figure remained at 30% when combining the number of people who said they neither support nor oppose the proposal with those that said they 'do not know'.</p> <p>However, between February and December there has been a decrease from 34% to 18% in the number of people who state they know nothing at all about the issue of adding fluoride to the water supply.</p>
<p>To meet the legal responsibilities placed upon the SHA by the Water Industry Act 1991 and the Water Fluoridation (Consultation) (England) Regulations 2005 and the responsibilities set out in the guidance issued by the Department of Health's Chief Dental Officer in February 2008</p>	<p>Legal advice has been sought throughout this consultation and it is the opinion of the SHA lawyers that the SHA's conduct of the consultation has complied with the relevant legal requirements and the CDO's guidance.</p>

The SHA has carried out an extensive public consultation to seek views on the water fluoridation proposal.

To support the SHA and other organisations in any future public consultations on this or any other subject a “lessons learned” document will be prepared in due course.

Olga Senior
Director of Communications and Corporate Affairs

18 February 2009