

Written evidence submitted by Headway UK (HB143)

1. About Headway UK and brain injury

Brain injury can challenge every aspect of your life – walking, talking, thinking, and feeling – and the losses can be severe and permanent. We all think 'it will never happen to me', but every year around 350,000 people are admitted to hospital with an acquired brain injury. That's one every 90 seconds.

[Headway UK – the brain injury association](#) is the UK-wide charity that works to improve life after brain injury by providing vital support and information services. We also support a network of over 100 independent Headway charities and volunteer-led branches across the UK and the Channel Islands, which provide a wide range of services, including rehabilitation programmes, carer support, social re-integration, community outreach and respite care to survivors and families in their own communities. This includes Headway Sussex, who are referred to below in our case study.

2. Transfer of NHS England functions to Integrated Care Boards (ICBs)

Headway UK recognises the UK Government's aim of reducing bureaucracy at the national level and giving local systems greater control over healthcare services. However, many ICBs are already facing significant financial and operational pressures, raising concerns about their ability to take on additional responsibilities, that may come about from the Bill, while continuing to commission effective services.

While transferring NHS England (NHSE) functions to ICBs has the benefit of improving accountability, doing so risks adding further pressures to ICBs already under strain. This risks having a knock-on effect for local Headway charities, many of which already rely on funding from ICBs and local authorities. Headway's [When Funding Fails \(2025\) report](#) found that 57% of charities surveyed had experienced delays in payments from ICBs or local authorities, while only 37% felt sustainable in the long term. ICBs are already under immense pressure, struggling to meet NICE guidelines for acquired brain injury, and this should be taken into account appropriately when transferring responsibilities.

3. Abolition of Healthwatch

Headway UK has concerns about the proposal to abolish Healthwatch. Independent patient advocacy and scrutiny play a crucial role in ensuring that the voices of brain injury patients, carers and communities are heard, particularly where services are under pressure.

Further to the above transfer of functions from NHSE to local ICBs, some of our network of local Headway charities have raised concerns that transferring these functions elsewhere could create a situation where local systems are effectively monitoring their own performance. At a time when many ICBs are already reducing spending and community services face growing pressures, independent scrutiny is arguably more important than ever.

The findings of our [*When Funding Fails \(2025\) report*](#) demonstrate the consequences for brain injury survivors when commissioning and funding decisions are not properly held accountable. For example, our report found that local authority and ICB commissioning rates often fail to cover the true cost of delivering services, financially pressured commissioners are cutting clients' hours, withdrawing support entirely, or increasing the costs to service users, many of whom cannot afford to pay, and ICBs are taking longer to pay for services and to complete client assessments, leaving brain injury survivors in limbo. Resultantly, vital gains made in neurorehabilitation are often lost.

Having an independent body watchdog to represent the views of patients is vital and should be strengthened, not have its accountability framework split up and undermined. Local accountability is important, but there must be clear national oversight as well.

Case Study: Headway Sussex

Headway Sussex provides reablement and support for individuals with acquired brain injuries and their families across Sussex.

The charity has concerns that NHS restructuring has reduced specialist expertise within the system. Following the merger of Sussex ICB into Surrey and Sussex ICB, the dedicated ABI Commissioner role was lost, removing valuable specialist knowledge and leadership for acquired brain injury services.

They also have concerns with proposals to abolish Healthwatch. Many people with brain injury struggle to navigate services and advocate for themselves, making independent support and scrutiny particularly important. Healthwatch provides an important route for Headway Sussex to refer patients and families to raise concerns about their care. The proposed removal of Healthwatch is a major concern for the people who do, and will, need their support.

4. Single Patient Record

Headway UK welcomes the principle of a Single Patient Record. Brain injury survivors often interact with multiple services across health and social care, and better information sharing could improve coordination, reduce duplication and support more joined-up care. This would also reduce reliving traumatic moments over and over and not cause unnecessary additional challenges for brain injury survivors who struggle with issues including memory loss and fatigue.

However, safeguards around privacy, consent and data security will be essential. These risks will always be present in such as this and must be handled with importance, especially in cases of vulnerable individuals including brain injury survivors.

Furthermore, the record must also accurately reflect the hidden and complex effects of brain injury and avoid creating further barriers for people who struggle with digital services. Technology is becoming an increasingly embedded aspect of society, with fast advancements that can be experienced as both a help or a hindrance to disabled populations. According to [Headway UK's survey report on isolation and loneliness after brain injury \(ABI Week 2026\)](#), a considerable proportion of the brain injury community do not feel confident with using technology despite a recognition of its potential benefits. While this focused on social media, this is important to consider usability of technology among these populations when designing systems such as the single patient record.

5. Overall position

Headway UK supports the Bill's aim of creating a more integrated and efficient NHS, particularly where reforms improve coordination of care and strengthen community-based support.

However, structural reform alone will not improve outcomes for brain injury survivors. The success of the Bill will depend on whether it delivers sustainable investment in rehabilitation and community services, protects independent patient voices, and supports ICBs to meet their expanded responsibilities without further reducing access to specialist support.

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