

Governing Body Meeting in Public 24th November 2016

Title: VBEC Consultation and Recommendations	Agenda Item: 12.0
Presented by: Donna Derby, Director of Commissioning and Performance	
Author: Donna Derby, SRO, Director of Commissioning and Performance Emmeline Watkins, Public Health Registrar	
Responsible Executive Director: Donna Derby, Director of Commissioning & Performance	
Has this paper been signed off by the Responsible Executive Director? Yes	
Actions/ Recommendations required by the Governing Body: <p>Three proposals were taken out to formal consultation</p> <ol style="list-style-type: none"> 1. To stop providing gluten-free foods unless there are specific circumstances whereby a dependant patient could be at risk of dietary neglect. 2. To stop providing over the counter (OTC) medicines on prescription for conditions that can be managed through self-care. 3. To stop routinely commissioning any specialist fertility services other than the two specified exceptions. <p>Recommended option: BCCG should proceed with proposals 1 and 2, but not 3.</p> <p>Therefore the Governing Body are recommended to:</p> <ol style="list-style-type: none"> a. Agree to stop providing gluten-free foods unless there are specific circumstances whereby a dependent patient could be at risk of dietary neglect; b. Agree to stop providing over the counter (OTC) medicines on prescription for conditions that can be managed through self-care. c. Agree to continue to routinely commission specialist fertility services according to BCCG current policy 	
Purpose of Paper: <p>Results from the formal consultation have been collated and assessed in conjunction with the impact assessments and additional evidence to allow Governing Body to come to a recommendation.</p>	
Background: <p>In December 2015 and January 2016, Bedfordshire Clinical Commissioning Group Executive management team considered a “long list” of possible treatments for disinvestment based on national research.</p> <p>In February 2016, the Governing Body agreed that the three proposals should be considered as there was limited evidence of their effectiveness or they were a low clinical priority, and therefore, should be considered as possibilities for limiting or ceasing funding:</p> <ol style="list-style-type: none"> 1. To stop providing gluten-free foods unless there are specific circumstances whereby a dependant patient could be at risk of dietary neglect. 2. To stop providing over the counter (OTC) medicines on prescription for conditions that can be managed through self-care. 	

3. To stop routinely commissioning any specialist fertility services other than the two specified exceptions.

In March 2016, preliminary engagement around the proposed service changes were carried out using a variety of methods including surveys workshops, working with voluntary groups (including Coeliac UK and Fertility Fairness) and working with an engagement group, to identify a range of issues to be included in a wider formal consultation process.

At the April 2016 meeting, the Governing Body considered the engagement feedback and agreed to begin a 12 week public consultation which commenced on 3 May 2016 and concluded on 24 July 2016. The consultation feedback, impact assessments and any additional information was collated and was due to be presented to the Governing Body on 22 September 2016, however due to the complexity of the decision, it was agreed that the report would be deferred until the Governing Body had the additional time to consider the information provided and it would be brought back to the November meeting.

Audit Trail:

- Consultation report circulated to Governing Body members – September 2016
- Technical documents and impact assessments approved by Executive Management Team

Strategy Implications:

This proposal supports Priority 2: Right care in the Right place.

Financial Implications:

- Estimated £315,000 annual financial saving on Gluten-free prescriptions
- Estimated £200,000 annual financial saving on OTC prescriptions
- Estimated £251,886 annual **cost** for retaining the specialist fertility services and keeping the existing policy.

Risks:

As a result of decisions to stop providing gluten free foods and over the counter medicines there is a risk of unfavourable media reporting and potential reputational damage which may result in the CCG losing the trust and confidence of some patients, public and stakeholders.

Legal Implications:

BCCG attended the Bedford Borough Overview and Scrutiny Committee to present the consultation and engagement project. During the meeting the OSC indicated that they did not support proposal 3 within the consultation and would be likely to ask BCCG to undertake a local resolution process, should BCCG go ahead with that proposal.

Has appropriate engagement and consultation taken place?

A full formal consultation was carried out and 1054 responses. Engagement activities took place with a number of groups as detailed in the report.

Has an appropriate equality and diversity assessment taken place?

Yes

Executive Summary:

The formal consultation, carried out between May and June 2016, included 1054 responses from individuals as well as formal responses from a variety of organisations including: Bedford Borough Adult Services and Health Overview and Scrutiny Committee, British Dietetic Association, the British Specialist Nutrition Association LTD, the Nutrition and Dietetic Department, Bedford Hospital NHS Trust and Bedfordshire Local Pharmaceutical Committee, Fertility Fairness and Bourn Hall, the full report is attached at appendix 1

The views, information and ideas provided by the individual and formal responses to the consultation have been used to inform the additional evidence assessment; Quality Impact Assessment, Equality Impact Assessment and Health Inequality Impact Assessments.

Given the response to the formal consultation and above listed impact assessments, it is recommended that:

Gluten-free foods

- To proceed with the proposal to stop providing gluten-free foods unless there are specific circumstances whereby a dependant patient could be at risk of dietary neglect.
- To mitigate any impact on vulnerable groups as much as possible by:
 - Providing prescriptions of gluten-free foods where a dependant patient is at risk of dietary neglect
 - Allow applications through the IFR process for exceptional clinical circumstances
 - Increasing the awareness, dietary support and education for those with coeliac disease through GPs, dieticians, community pharmacies and other mechanisms including suppliers
- To monitor the short-term impact of the change in policy by:
 - Auditing the use of gluten-free prescriptions for patients at risk of dietary neglect

Over the counter medications

- To proceed with the proposal to stop providing Over the Counter (OTC) medicines on prescription for conditions that can be managed through self-care
 - Exclusions would include treatments that are needed for a long-term condition (including if there are legal restrictions on the amount of medication available OTC), if licensing of the OTC product is restricted for the patient or where there are possible safeguarding concerns. In these cases the patient's regular clinician will still be able to prescribe OTC medicines
- To mitigate any impact by:
 - Increasing information on self-care pathways in Bedfordshire and ways to help self-manage conditions

Specialist Fertility Services

- To keep the existing specialist fertility services [current policy](#).

Next steps

If the recommendations are approved, full implementation plans will be developed. It is anticipated that implementation will start in Q4 2016/17 to allow sufficient notice to be given to all stakeholders.