

Non-Executive Report of the:

Health Scrutiny Subcommittee

5 March 2018



Report of: Tower Hamlets Clinical Commissioning Group

NHSE consultation on conditions for which over the counter items should not be prescribed in primary care

Originating Officer(s)

Samantha Buckland
Prescribing Adviser
NEL Commissioning Support Unit

Summary

Following the NHS England consultation on items of low/limited clinical value which should not be routinely prescribed in primary care in 2017; the decision was taken to further consult about conditions for which over the counter items should not be routinely prescribed in primary care. The consultation launched on 20th December 2017 and closes on 14th March 2018.

The full consultation guidance can be accessed at the links below:

- <https://www.engage.england.nhs.uk/consultation/over-the-counter-items-not-routinely-prescribed/> - main NHSE webpage
- https://www.engage.england.nhs.uk/consultation/over-the-counter-items-not-routinely-prescribed/user_uploads/otc-guidance-2.pdf - official consultation guidance document
- https://www.engage.england.nhs.uk/++preview++/consultation/over-the-counter-items-not-routinely-prescribed/user_uploads/otc-ehi-analysis-form.pdf - national impact and equality analysis (NB: a local THCCG analysis will be completed)
- <https://www.engage.england.nhs.uk/consultation/over-the-counter-items-not-routinely-prescribed/consultation/intro/> - link to the online feedback form. Questions from the online form are listed in appendix 4 of the guidance document.

A summary paper of the 35 minor/self-limiting conditions and their recommendations with the known cost per 1000 patients data for TH CCG is enclosed, along with an appendix showing the graphical comparison data with other CCGs.

It is important to note that TH CCG has not previously conducted a local consultation on restricting OTC medicines. Therefore a local consultation will be run to coincide with the national consultation such that any impact assessment and decisions made on restricting prescribing will take into account any local factors such as deprivation or vulnerable groups. A communications and engagement plan, in conjunction with NELCSU, has been developed and is fully underway to ensure all patient groups, healthcare organisations, vulnerable or at risk groups, MPs and other affected

parties are consulted with.

Nationally in the year prior to June 2017 the NHS spent approx. £569 million on prescriptions for minor conditions, which could otherwise be purchased over-the-counter from a pharmacy and/or other outlets such as petrol stations or supermarkets. This consultation focuses on £136 million that could be potentially saved from those prescriptions as listed below.

These prescriptions include items for conditions:

- Considered as self-limiting do does not need treatment
- Lends itself to self-care so could manage by purchasing over the counter items

Or items:

- That can be purchased over the counter at a lower acquisition cost that would be incurred by the NHS (from A&E attendance, GP appointment time, Dispensing costs etc)
- For which there is little evidence of clinical effectiveness.

There are general exclusion criteria on p9 of the consultation document.

CCGs asked for a nationally co-ordinated approach to develop guidance to ensure consistency and to address unwarranted variation.

Key issues locally:

- Encouraging full THCCG and partners plus public engagement with both local and national consultation
- How this may affect future patient pathways (particularly as there is an additional consultation until 21st February 2018 on draft NICE guidance on community pharmacy promoting health and wellbeing due for full publication in August 2018)
- Impact on future of Pharmacy First and similar commissioned minor ailment services
- Impact on and potential support for vulnerable groups not explicitly mentioned in the consultation such as schools (medication policies), care homes (homely remedies), homeless (access to medicines)
- Support for prescribers
- Potential of encouraging positive messages around self-care and wider accessibility to advice or treatment
- Risks of any media attention locally

Recommendations:

The HSC Committee is recommended to:

1. Read the [consultation](#) in line with NHSE requirement for consultation to be discussed at a local overview and scrutiny committee.
2. Respond as an organisation if conclude there is a need to via the online survey available at <https://www.engage.england.nhs.uk/consultation/over-the->

[counter-items-not-routinely-prescribed/consultation/intro/](#) or written responses can be sent to england.medicines@nhs.net before 14th March 2018.

3. Encourage affected local patients and public to respond to the consultation
4. Encourage local healthcare professional colleagues and/or local partnership patient/public organisations to respond either individually or as local organisations to the consultation
5. Follow the public media releases from THCCG and share widely