

Equality Impact and Risk Assessments

Gluten Free and Self Care

Morecambe Bay CCG

Current Status

Stage 1 Approved

Review Date

05/09/2017

Person Responsible

Atkinson, Graham

Service

Commissioning

Service Area

Prescribing

Project Lead

Name:

Atkinson, Graham

Email:

Phone:

Explanation

CCGs in Lancashire spend approximately £700K on gluten-free prescribing alone. The items prescribed in this area of gluten free or self care are either: widely available over the counter (in pharmacies some local shops and most supermarkets) prescribed for conditions that have no clinical need of treatment or supported by insufficient evidence of clinical benefit or cost effectiveness. The products range from short-term pain killers for self-limiting conditions through to treatments where there is limited evidence of clinical benefit and gluten free prescribing. Morecambe Bay CCG are looking to implement a policy setting out what they will not prescribe for conditions where self-care is the most appropriate route, where medicines are available to buy over the counter or where there is insufficient evidence of clinical benefit for the prescribing while ensuring any adverse impact against a protected characteristic or other at risk group is minimised.

Assessment

Equality Impact

1	Does this issue plan to withdraw a service, activity or presence?	
<p>Yes the intention of implementing this policy would be to stop the prescribing of products that fell into the categories listed in the summary section. It is felt that the current provision in these areas introduces an element of inequity as a number of patients will already purchase these items and we don't pay for foods to support other conditions such as sugar free foods for diabetics.</p>		
2	Does this issue plan to reduce a service, activity or presence?	
<p>As per question 1, this would look to stop prescribing in these areas.</p>		
3	Does this issue plan to introduce or increase a charge for Service?	
<p>No</p>		
4	Does this issue plan to make a change to a commissioned service?	
<p>No</p>		
5	Does this issue plan to introduce, review or change a policy, strategy or procedure?	
<p>Yes this plans to implement the policy which does not recommend prescribing in these areas.</p>		
6	Does this issue plan to introduce a new service or activity?	
<p>No</p>		
7	Is this primarily about improving access to, or delivery of a service?	

No		
8	Does this affect Employees or levels of training for those who will be delivering the service?	
No		
9	Does this issue affect Service users?	
Yes, service users who may be used to getting a number of these products on prescription will be asked to buy them in the future.		
10	Can you foresee a negative impact on any Protected Characteristic Group(s)? <i>If YES please state what these could be.</i>	
<p>Having considered the protected characteristics groups, patients with a true tolerance to gluten intolerance could be diagnosed with Celiac disease.. Another area of concern that we have been able to identify is that patients who are on a limited income may, for financial reasons, not purchase gluten free preparations. Gluten intolerant patients are a spectrum of patients ranging from those that feel better if not taking Gluten Free foods to those with a diagnosed gluten intolerance if they were to take gluten containing foods this would have serious health consequences. Many adults with subtle disease only have fatigue, or may have only vague abdominal discomfort such as bloating, abdominal distension and excess gas. Celiac disease is a permanent disorder and its effects may change from time to time during a person's lifetime. Subtle symptoms can occur in other organs - other than the bowel itself. Some signs and symptoms are due to malabsorption and malnutrition resulting from the disorder. It should also be noted that symptoms can vary greatly from person to person</p>		

Equality Risk

11	Have you got any general intelligence (research, consultation, etc.)? <i>If YES please list any related documents.</i>	
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<p>We are aware of similar policies being developed and implemented in other areas. E.g. Blackpool CCG implemented a gluten free policy in November 2015, there is now no prescribing of Gluten Free preparations in this CCG. East Lancashire CCG have carried out engagement activities including discussions with the local Celiac Society. Warrington CCG has implemented a self-care policy similar to the above in January 2016. West Cheshire CCG has also just undertaken a comprehensive consultation exercise and have finalised their policies in these areas. Please see attached to this document the consultation documents and reports available for Warrington and West Cheshire. See associated action plan for documents provided as evidence</p>		
12	<p>Have you got any specific intelligence (research, consultation, etc.)? <i>If YES please list any related documents.</i></p>	
<p>As per answer to question 11. There is no published evidence that we are aware of that specifically looks at the clinical implications of removing these preparations from prescription.</p>		
13	<p>Have you taken specialist advice? (Legal, E&I Team, etc). <i>If YES please state.</i></p>	
<p>Yes we have met with a representative of the E&I Team.</p>		
14	<p>Have you considered your Public Sector Equality Duty? <i>Please provide a rationale.</i></p>	
<p>Yes - we don't think that this would have a negative impact on the organisations Public Sector Equality Duty as Due Regard will be given throughout the process.</p>		
15	<p>Do you plan to publish your information? <i>Include any "Decision Reports"</i></p>	
<p>We intend to publish the responses received as part of the engagement event alongside any final policy.</p>		
16	<p>Can you minimise any negative effect? <i>Please state how.</i></p>	

<p>Yes, we feel that by conducting a robust engagement process and having the availability of patient support materials we can mitigate the majority of the negative effects of implementing the policy.</p>		
17	<p>Do you have any supporting evidence? <i>If YES please list the documents.</i></p>	
<p>See Q11 & Q12</p>		
18	<p>Have you/will you engage with affected staff and users on these proposals?</p>	
<p>Yes we think that engagement is an important part of the process for developing and implementing the policy, we are in discussions with Communication and Engagement to look at an appropriate engagement process. This consultation seeking views on Department of Health proposals on whether or not to make changes to availability of gluten free (GF) foods that are prescribed in primary care ended in June 2017. The results and recommendations will be given consideration during the decision making process. * See Associated Action Plan for documentational evidence*</p>		

Human Rights Impact

19	<p>Will the policy/decision or refusal to treat result in the death of a person?</p>	
<p>NO</p>		
20	<p>Will the policy/decision lead to degrading or inhuman treatment?</p>	
<p>NO</p>		
21	<p>Will the policy/decision limit a person's liberty?</p>	
<p>NO</p>		

22	Will the policy/decision interfere with a person's right to respect for private and family life?	
NO		
23	Will the policy/decision result in unlawful discrimination?	
NO		
24	Will the policy/decision limit a person's right to security?	
NO		
25	Will the policy/decision breach the positive obligation to protect human rights?	
NO		
26	Will the policy/decision limit a person's right to a fair trial (assessment, interview or investigation)?	
NO		
27	Will the policy/decision interfere with a person's right to participate in life?	
NO		

Stage 2 Details

Equality Policies

No files uploaded

Equality Other

No files uploaded

Human Rights

No files uploaded

Additional Files

No files uploaded

Comments

Assessment Comment

A comprehensive EIA regarding this policy providing analysis as part of the formal public consultation and engagement with other CCGs as been produced and provided as evidence. An associated action plan for Morecambe Bay CCG has been produced and if implemented no Stage 2 Required. The action plan advocates that a local engagement is sought with key stakeholders and that feedback is fed into the decision making body for consideration.

05/09/2017

Thelwell, Granville

Approval Comment

Associated action plan states that: 1.Issue/s: Prepay Prescription certificates may need to be refunded Action: Agree to refund coeliac patients who have prepaid for prescriptions for gluten free food. 2.Issue/s: Protected groups who may be impacted by this policy choice include: older people, those with a disability, pregnancy and maternity, and those on low incomes. Action: Ensure proportionate engagement activities focus on these groups and patients on low income and/or from deprived areas. Action: Either seek advice from Coeliac UK and/or from other CCG who have engaged with local Coeliac UK Action: Consider developing an appeals process for individual cases to be considered Action: Feedback from local engagement should be fed back into the decision making process/body for consideration By complying with the associated action plan no Stage 2 assessment will be required.

05/09/2017

Thelwell, Granville

Stage 2 Comment

No comment saved

Last Activation Comment

No comment saved

Last Deactivation Comment

No comment saved