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Proposals on changes to prescribing: Mid-point PPI review

9 December 2016



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Introduction

On November 11 2016 NHS Croydon CCG launched an eight-week (11/11/16 to 6/1/2017) Patient and Public engagement programme around proposed changes to prescribing in Croydon which will impact on a large number of Croydon residents. The proposals focus on 4 areas:

- No longer issuing prescriptions for Gluten free food to patients with a diagnosis of coeliac disease
- No longer prescribing Vitamin D (for maintenance only)
- Reducing prescriptions for baby milk formulas to specific exempted group
- No longer prescribing specific self-care medications, with the exception of paracetamol for patients with chronic conditions

The pre-engagement work undertaken identified some concerns that the proposals may impact upon Croydon residents who share protected characteristics under the Equalities Act (2010) and people living in areas of high deprivation.

The focus of the engagement is to encourage patients, Croydon residents, local stakeholders and community and voluntary sector organisations, especially those working with vulnerable individuals in the Borough to discuss the proposals, identify any concerns they may have and to comment on the exceptions the CCG has suggested and whether there are further exemptions we should consider.

Purpose of the report

The purpose of this report is to present a mid-point review of the engagement process. This includes:

- Who we have engaged with to date, including demographic details to ensure we are reaching Croydon's diverse populations
- The types of engagement activity to date
- Key issues raised during the engagement
- Specific and general concerns expressed by participants
- Any gaps in the reach of the engagement and mitigating action to address any gaps

Engagement activity to date

Up to and including the date of this report the following activities have taken place as part of the engagement process:

Activity	Reach	Numbers attending
Pre-engagement meeting to test messaging	OBC Service User Group	11

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PPI Forum – 5 October	Patients and the public	44
Engagement materials released and uploaded to CCG website	All Croydon	n/a
Notice sent to PPI Contacts via Get Involved	CGG Network – patients and CVS	300+
Request to partners to host meetings	CVS partners including Croydon Communities Consortium	n/a
Public Meeting – CCC – 23/11/16	Croydon wide	17
Engagement documents to Selsdon centre for the retired	Selsdon	30
Meeting with Healthwatch Croydon volunteers to support outreach – 7/12/16	Healthwatch Croydon	7
Shirley Medical Centre drop in session – 5/11/2016	Patients at Shirley Medical Centre	10+
Meeting with Croydon Voluntary Action Family Guides – outreach 8/12/17	CVA volunteers	5
PPG Meeting – Headley Drive – 8/12/16	New Addington	5
On-line and paper survey	All	94

Participant features: survey and public meetings

The demographic details of participants who attended the Croydon Communities Consortium meeting have been requested and are not currently available in this report.

Participants at the CCG meetings were encouraged to complete an evaluation form which asked for equalities monitoring details. The majority of the attendees completed these details at the meetings on 5 October 2016.

The on-line and paper survey request demographic details from the respondent's. The respondent can skip these questions.

Analysis from all sources shows that in the domains of age and ethnicity the respondents are not representative of Croydon communities. Furthermore particular neighbourhoods are over represented with residents from the south of the Borough over represented:

- 68% of respondents are aged over 55

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- 80% of the respondents identify themselves as white British or white other

Response to survey questions

Below is a brief summary of the responses to the survey questions (94 responses):

Question	Strongly agree/agree	Strongly disagree/disagree
Having read the engagement document, how much do you agree with the statement "I understand why the local NHS is proposing to stop prescribing some items which are now readily available or cheaper to buy directly?"	62%	36%
How much do you agree that the local NHS should stop prescribing gluten-free products?	43.5%	52%
How much do you agree that the local NHS should stop providing Vitamin D other than for the exempt groups listed in the engagement document?	57%	30%
How much do you agree that the local NHS should stop providing all prescribed soya, thickened or lactose-free baby milks and infant formula except for the exemptions outlined?	48%	30%
How much do you agree that the local NHS should stop prescribing over the counter medicines for minor illnesses other than for the exempt groups listed in the engagement document?	75%	19%

Key themes/issues

There are three main themes that have emerged through both the survey and the face to face discussions are:

1. Concerns about affordability for people on very low incomes, this is especially true in the areas of baby milk and vitamin D. Other groups who were felt to be vulnerable under the proposals are:
 - Older people with memory loss
 - Children under 5
 - Low income families
 - Older people on limited incomes
 - People who currently receive free prescriptions

As a result of this there is a small, but significant, number of people who have suggested that under 5's should be exempted from all four proposals.

2. The second concern focuses on the prescribing of gluten free food and Vitamin D Maintenance doses. The concern focuses on peoples continued adherence to sticking to a gluten free diet and purchasing Vitamin D supplements if they are no longer prescribed. Interestingly this concern does not include the baby milk proposal.

This has led to concerns that people will become unwell and have to be treated for preventable illness.

To mitigate these concerns it is suggested that additional advice on alternatives gluten free suitable diets is provided through patient fact sheets and placed on the CCG website. Similarly information and advice on correct maintenance doses for Vitamin D should also be made widely available to patients and the public to help reassure them about under and over dosing.

3. The final concern has come through practice staff and GPs who will have to 'police' the changes. There concerns are:
 - The changes will not be applied consistently across Croydon
 - Patient complaints will increase which will require additional resources to manage
 - Some patients may make additional appointments to argue the case for why they should still receive prescriptions for certain items

Consideration should be given to these concerns and how the CCG could support practices should the changes be agreed in January.

Gaps and mitigations for the engagement process

The current data shows that hard to reach and seldom heard groups are not represented in the engagement to date. To mitigate this and ensure that groups sharing protected characteristics are supported to engage Croydon Voluntary Action will be undertaking outreach through the Family Guides programme. Family guides work predominantly in areas of high deprivation with seldom heard groups. They have agreed to work with between 75 and 100 people to gather their views on the proposals.

Additional Healthwatch Croydon has encouraged their volunteers to help support the CCG with outreach activity for the remainder of the engagement period. Seven Healthwatch Croydon volunteers have met with the PPI lead already with an additional 3 volunteers expressing an interest in supporting the outreach. This will allow for the distribution of the engagement documents much more widely.



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Croydon
Clinical Commissioning Group

Coeliac UK and the local coeliac support group have responded to the engagement but other organisations supporting people who may be affected by the proposed in particular have not yet submitted comments. It would be helpful to contact groups such as Arthritis UK and Children's Centres to encourage them to respond to the proposals.

Planned Activity to 6 Jan 2017

Croydon Voluntary Action family guides undertaking targeted outreach (12/12 to 6/1)
Drop-in Session at Parkway Medical Centre (main reception and Baby clinic) either 13/12 or 20/12
Public meeting 13 December
Drop-in session at Old Coulson Medical Practice 16/12
Outreach in Libraries (New Addington and Thornton Heath)
Outreach in Leisure Centres (New Addington, Central Library, Thornton Heath)

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