

## **Items which should not routinely be prescribed in primary care: an update and a consultation of further guidance for CCGS**

Equality and Health Inequalities: NHS England has legal duties which require giving due regard to the need to eliminate discrimination, harassment and victimisation, to advance equality of opportunity, and to foster good relations between people who share a relevant protected characteristic (as cited under the Equality Act 2010) and those who do not share it; and having regard to the need to reduce inequalities between patients in access to, and outcomes from healthcare services and to ensure services are provided in an integrated way where this might reduce health inequalities. An initial Equality and Health Inequalities Assessment (EHIA) has been carried out on these proposals and this can be read here. Further information on our duties can be read at <https://www.england.nhs.uk/about/equality/>

**Do you feel there are any groups, protected by the Equality Act 2010, likely to be disproportionately affected by this work?**

Yes (please tick all that apply)/No

NO – (people with low income are not one of these groups)

Age/disability/gender reassignment/race/religion or belief/sex/sexual orientation/marriage and civil partnership/pregnancy and maternity Please provide further information on why you think this might be the case.

**Do you feel there is evidence we should consider in our proposals on the potential impact on health inequalities experience by certain groups e.g. people on low incomes; people from black and minority ethnic (BME) communities?**

Yes/No

Yes

Please provide further information on why you think this might be the case

If some of these products are no longer prescribed then some people, who would like to continue to use the products, would buy them where they are available to purchase – such as bath emollients. Those with low incomes would be less likely to be able to purchase these products due to affordability issues.

### **Section 3: How will the guidance be updated and reviewed?**

Thinking about the process for future update and review of the guidance:

**How do you feel about the proposed process for identification of items for possible addition to the guidance or indeed possible removal, from the guidance?**

Agree/Neither agree or disagree/Disagree/Unsure if needed,

UNSURE

please provide further information.

Having been involved in the NHS England working group we are concerned about the lack of patient engagement prior to initial options for change being developed. There are no patient representatives on the working group and we would recommend that National Voices, Patients'

Association and Healthwatch England are invited onto the group. There should be significantly more engagement with patients who may be affected by the recommendations made in this and future guidance.

Also we would recommend that a cost benefit evaluation should be undertaken for the products within the guidance.

#### **Section 4& 5: Proposals for CCG commissioning guidance**

Please select which items you would like to share your views on (please select)?

##### ***Reviewed item***

- Rubefacients (excluding topical NSAIDs)  
Do you agree with the proposed recommendations for Rubefacients (excluding topical NSAIDs)?  
Agree/Neither agree or disagree/Disagree/Unsure If needed, please provide further information  
AGREE

##### ***New items***

- Aliskiren  
Do you agree with the proposed recommendations for Aliskiren?  
Agree/Neither agree or disagree/Disagree/Unsure if needed, please provide further information  
AGREE. However, patients may be moved to alternative medicines that are more expensive.
- Amiodarone  
Do you agree with the proposed recommendations for Amiodarone?  
Agree/Neither agree or disagree/Disagree/Unsure if needed, please provide further information  
AGREE. Prescribing of this medicine should be part of a shared care approach as outlined in NHSE guidance:  
<https://www.england.nhs.uk/publication/responsibility-for-prescribing-between-primary-and-secondary-tertiary-care/>
- Bath and shower preparations for dry and pruritic skin conditions  
Do you agree with the proposed recommendations for bath and shower emollient preparations?  
Agree/Neither agree or disagree/Disagree/Unsure if needed, please provide further information  
UNSURE. These products are often prescribed as part of an overall treatment plan for very severe conditions. If these preparations are no longer prescribed then there is likely to be an increase in the prescribing of 'leave on' emollients which also have an associated risk. When using these products on small children they become very slippery and ongoing work with emollients is demonstrating a potential fire hazard with fabrics that have been impregnated with the product and then dried. The products, which are obviously applied to the skin, soak into the fabric of clothes and the fabric then dries. The product itself is not flammable and neither is the moist product on material. However, repeated applications could be a problem. So, for example, if a child has a bath and uses 'leave on' emollient products, there

could be a potential fire risk if this is done on repeated occasions. This needs further exploration.

- Blood glucose testing strips for type 2 diabetes

Do you agree with the proposed recommendations for blood glucose testing strips?  
Agree/Neither agree or disagree/Disagree/Unsure if needed, please provide further information

UNSURE: Before this is agreed we would like to be reassured that the evidence shows that the cheaper glucose monitors and cheaper testing strips are as effective and as easy to use as the more expensive models and testing strips. In addition, if people have insulin-treated diabetes they need to test blood glucose before driving and re-test blood glucose every two hours on a long journey. Therefore, the blood glucose monitors and strips need to be an acceptable product for those who have to drive long distances.

- Dronedarone

Do you agree with the proposed recommendations for Dronedarone?  
Agree/Neither agree or disagree/Disagree/Unsure if needed, please provide further information

AGREE

- Minocycline

Do you agree with the proposed recommendations for Minocycline?  
Agree/Neither agree or disagree/Disagree/Unsure if needed, please provide further information

AGREE

- Needles for Pre-Filled and Reusable Insulin Pens

Do you agree with the proposed recommendations for needles for pre-filled and reusable insulin pens?  
Agree/Neither agree or disagree/Disagree/Unsure if needed, please provide further information

UNSURE: Again, we would like to see the evidence that demonstrates the cheaper needles are as easy to use and effective as the more expensive needles.

- Silk Garments

Do you agree with the proposed recommendations for silk garments?  
Agree/Neither agree or disagree/Disagree/Unsure if needed, please provide further information

AGREE