

<b>Homeopathy Commissioning</b>			
<b>Agenda Item:</b>	14	<b>Reference:</b>	PEC10-11/257
<b>Report to:</b>	Professional Executive Committee	<b>Meeting Date:</b>	18 January 2011
<b>Lead Director:</b>	Cathy Gritzner, Director of Health Systems Management Fiona Johnstone, Director of Public Health		
<b>Lead Medical Director:</b>			
<b>Lead Officer:</b>	Dr Helen Bromley, Specialty Registrar in Public Health		
<b>Contributors:</b>	Teresa Owen, Consultant in Public Health Julia Simms, Head of Medicines Management		
<b>Governance:</b>	<b>Link to PCT Strategy</b>	To be a high performance, high reputation organisation	
	<b>Link to current <a href="#">Operational Plan Objectives</a></b>	A nationally recognised clear correlation between improving quality (by using evidence based practice) and using care pathways.	
<b>Summary:</b>	<p>This paper gives an overview of the scientific evidence for the efficacy of homeopathic therapies to enable NHS Wirral to make rational and evidence-based commissioning decisions about homeopathic therapies.</p> <p>The paper concludes that the lack of evidence on efficacy and cost-effectiveness of homeopathic therapies means that it should not be a high priority for the PCT at this time.</p> <p>It is recommended that NHS Wirral does not commission homeopathic therapies.</p>		
<b>Recommendation:</b>	<b>To Approve</b>		✓
	<b>To Note</b>		✓
	<b>Comments</b>		
<b>Next Steps:</b>			

This section is an assessment of the **impact** of the proposal/item. As such, it identifies the significant risks, issues and exceptions against the identified areas. Each area must contain sufficient (written in full sentences) but succinct information to allow the Board to make informed decisions. It should also make reference to the impact on the proposal/item if the Board rejects the recommended decision.

What are the implications for the following (please state if not applicable):		
<b>Financial</b>	Annual savings of £35, 270.	
<b>Value For Money</b>	The proposal represents a cost-saving	
<b>Risk</b>	The key risk is that NHS Wirral fails to maintain its reputation as an evidence-based commissioning PCT.	
<b>Legal</b>	The scientific evidence base regarding homeopathy is an evolving field and may change in the future. NHS Wirral should continue to monitor the evidence base regarding homeopathy and review its commissioning policy accordingly. This is imperative as there may be challenges to the commissioning decision.	
<b>Workforce</b>	No impact on NHS workforce. There is a need to communicate the policy to relevant commissioning and provider staff.	
<b>Equality &amp; Human Rights</b>	NHS Wirral commissions evidence based therapies/treatments. An EIA has been completed.	
<b>Equality Impact Assessment (EIA)</b>	<b>Attached</b>	✓
	<b>N/A</b>	
	<b>Other</b>	
<b>Patient and Public Involvement (PPI)</b>	A recommendation has been made to PEC members to consider whether formal engagement with patients and other stakeholders regarding homeopathy services is required.	
<b>Partnership Working</b>	NHS Liverpool are currently considering their position on homeopathy commissioning.	
<b>Performance Indicators</b>	Not applicable to homeopathy.	
<b>Do you agree that this document can be published on the website?</b> (If not, please note that it may still be subject to disclosure under Freedom of Information - <a href="#">Freedom of Information Exemptions</a> )		✓

*This section gives details not only of where the actual paper has previously been submitted and what the outcome was but also of its development path i.e. other papers that are directly related to the current paper under discussion.*

<b>Report History/Development Path</b>				
<b>Report Name</b>	<b>Reference</b>	<b>Submitted to</b>	<b>Date</b>	<b>Brief Summary of Outcome</b>
N/A				

## NHS Wirral

### Homeopathy Commissioning

#### Introduction

1. The purpose of this report is to provide an overview of the scientific evidence for the efficacy of homeopathy treatments and to inform consistent PCT commissioning decisions that are made regarding homeopathic therapies.

#### Background

2. Homeopathy is a 200-year old system of medicine that seeks to treat patients with highly diluted substances that are administered orally. It is claimed that homeopathy works by stimulating the body's self-healing mechanisms<sup>1</sup>. Homeopathic products should not be confused with herbal remedies. Some homeopathic products are derived from herbal active ingredients, but the important distinction is that homeopathic products are extremely diluted and administered according to specific principles. Homeopathic therapies do **not** include acupuncture.
3. Decisions on the use of homeopathy are left to the National Health Service (NHS)<sup>2</sup>. Primary Care Trusts (PCTs) are responsible for commissioning care services and are thus currently free to fund homeopathy<sup>2</sup>.
4. Currently, NHS Wirral has a block contract with Liverpool PCT for homeopathy to the value of £35,270 per year. This contract is due to expire on 31 March 2011 and Liverpool PCT are not wanting to renew the current provider Liverpool Provider Services, and they have recently served notice to withdraw this service.
5. NHS Wirral has received six letters from service users relating to homeopathy treatments. These refer to a range of conditions (skin condition, prostate cancer, asthma and osteoarthritis, a learning difficulty/behaviour condition, several complaints together and also chronic fatigue syndrome and insomnia). All six letters praise the homeopathy services and treatments received<sup>3</sup>. In addition, the Chairman of the '*North West Friends of Homeopathy*' has written to the PCT in support of homeopathic services on the Wirral, and asking for an overview of the patient consultation plans should the treatments be discontinued<sup>4</sup>. All letters have received a standard response. This response details that the PCT recognises that homeopathic care on the Wirral is popular and valued by patients receiving the care, and that the matter is currently under review due to changes being made by the provider of the homeopathy services.
6. The NHS Wirral complex case team have received general queries regarding homeopathy treatments; however the team have not received any formal letters regarding this area. These queries have related to:
  - Two patients already in the system and receiving homeopathy treatment and their ongoing management – advice was given in line with the NHS Wirral Procedures of Low Clinical Priority.
  - One new potential referral - advice was given in line with the NHS Wirral Procedures of Low Clinical Priority.

#### Scientific Evidence for the Use of Homeopathic Products

7. In February 2010, the House of Commons Science and Technology Select Committee reported in detail on the effectiveness of homeopathy and policies relating to homeopathy provision in the National Health Service.

8. Based on the current scientific evidence, the Select Committee concluded that:
- There is no evidence that homeopathy works beyond the placebo effect.
  - By providing homeopathy on the NHS, the Government runs the risk of appearing to endorse it as a working system of medicine.
  - There is also a danger that when doctors prescribe placebos, they risk damaging the trust that exists between them and their patients.
9. Other PCTs have also reviewed their commissioning arrangements for homeopathic therapies:
- NHS West Kent undertook a high quality review of their homeopathy commissioning in 2007 and concluded that it did not represent value for money in the light of competing NHS funding priorities. NHS West Kent now does not fund routine homeopathy treatment
  - Oxfordshire PCT Priorities Forum in February 2009 confirmed that because there was no conclusive evidence for the effectiveness of complementary therapies, and that Oxfordshire's health economy had to prioritise mainstream treatments for which there was evidence of effectiveness, the commissioning of alternative and complementary therapies (including homeopathy) was a low priority for Oxfordshire PCT
  - Greater Manchester Medicines Management Group decided In July 2010 that the prescribing, referral or recommendation of homeopathy is a low priority for the NHS and cannot be supported.

## Local Policies

10. **Cheshire and Merseyside Prior Approval Scheme Policy**  
The Cheshire and Merseyside Prior Approval Scheme Policy (June 2010) states that for homeopathy/acupuncture:

“Based on recent Effective Health Care Reviews (Effective Health Care Vol. 7 York University) there is currently insufficient evidence to recommend homeopathy as a treatment for any specific condition or to warrant significant changes in the provision of homeopathy (in the NHS). The PCT will therefore not provide funding for individuals to receive homeopathic treatment as part of current care pathways or outside usual pathways...The PCT will not commit additional resources to extend the current service provision in primary care nor provide for alternative routes of access to homeopathy.”

11. **NHS Wirral Commissioning Policy for Alternative and Complementary Therapies**

The Policy states:

“Complementary medicine/alternative therapies are generally not funded by Wirral NHS. They are occasionally used as a treatment as part of a mainstream service care plan (e.g. as part of an integrated multidisciplinary approach to symptom control by a hospital based pain management team) and as such will be funded either as part of the PBR tariff or explicitly agreed in the SLA. On existing available evidence the PCT would not support referral outside the NHS for these services. Prior approval is required on a case by case basis by the PCT Health Treatment Panel for any requests outside the above criteria. The HTP will require proven evidence of effectiveness of the therapy, failure of conventional treatment and assurance concerning the training and qualifications of the proposed provider practitioners.”

10. NHS Wirral Medicines Management Team has developed prescribing policies that restrict treatments of low clinical priority or where the drug choice cannot be clinically justified for the specified indication. Currently 6 prescribing policies have been approved and additional policies are being developed as further suitable areas are identified.
11. All NHS Wirral prescribing policies are underpinned by detailed clinical evidence reviews. Draft policies are subject to consultation at local clinical meetings with Medical Directors, GPs and pharmacists. The final policies are ratified at the Professional Executive Committee and published on the PCT website.

## Conclusions

12. Given the lack of evidence on efficacy and cost-effectiveness of homeopathic therapies, it is recommended that NHS Wirral does not commission homeopathic therapies.

## Recommendation

13. The Professional Executive Committee members are asked to:
  - Note the evidence regarding the efficacy and cost-effectiveness of homeopathic therapies
  - Approve the recommendation not to commission homeopathic therapies, and to ensure that all NHS Wirral policies are consistent to this effect
  - Consider whether formal engagement with patients and other stakeholders regarding homeopathy services is required

### Cathy Gritzner

Director of Health Systems Management

### Fiona Johnstone

Director of Public Health

### Helen Bromley

Specialty Registrar in Public Health

### Teresa Owen

Consultant in Public Health

29 December 2010

## References

1. "What is homeopathy?" The Society of Homeopaths, [www.homeopathy-soh.org](http://www.homeopathy-soh.org) cited in Reference 2
2. House of Commons Science and Technology Committee (2010) Evidence Check 2: Homeopathy, Fourth Report of Session 2009–10, The Stationery Office, London.
3. Letters from service users(PCT references)
  - KD/JPH/Mercer/2142
  - KD/JPH/Butte/2170
  - KD/JPH/Thorburn/2171
  - KD/JPH/Lyon/2197
  - KD/SR/Buchanan/2291
  - KD/JPH/Hanrahan/2302
4. Letter from the North West Friends of Homeopathy: KD/JPH/Cook/2189

## Equality Impact Assessment Template

### Section 1: Your details

(1.1) Department: Public Health

(1.2) Division: Public Health

(1.3) Assessment Lead:

Helen Bromley, Specialty Registrar Public Health  
Teresa Owen, Consultant in Public Health

(1.4) Telephone: 0151 651 0011 x 1618

(1.5) Email:

[Helen.bromley@wirral.nhs.uk](mailto:Helen.bromley@wirral.nhs.uk)

[Teresa.owen@wirral.nhs.uk](mailto:Teresa.owen@wirral.nhs.uk)

(1.6) Who else will be involved in the process? (see guidance note 1)  
Public Health and Commissioning Colleagues

(1.7) Please sign & date this form ...Helen Bromley (signed) ...06/12/2010

**Section 2: What is to be assessed?**

(2.1) Name of service / function / project / strategy / policy to be assessed (see guidance note 2)

**Commissioning Policy on Homeopathy**

(2.2) Is this a new or existing service / function / project /strategy / policy? (please state)

**Existing**

(2.3) Has it been assessed before and if so please attach the existing assessment.  
**Not aware of a previous assessment**

**Guidance Note 2:**

Service = your department / service area and its employees

Functions = your department / service area's activities

Projects = your department / service area's work programmes

Strategy = a plan of action intended to accomplish a specific goal

Policy = a plan of action to influence and determine decisions, actions and other matters

Procedure = a series of steps taken to implement a policy

### Section 3: Let's do the Initial Equality Impact Assessment (Screening)

3.1 Could a particular group of people be affected differently in either a negative or positive way by the service / function / project / strategy / policy?

Equality Group	Positive Impact (benefits) Please number each one	Negative Impact (disadvantage) or potential negative impact Please number each one and provide evidence	Please rate each negative impact 'low', 'medium' or 'high' See guidance note 3
Disabled People	There is a lack of evidence on the efficacy and cost-effectiveness of homeopathic therapies, therefore measuring the positive or negative impact is inappropriate at this time.	N/A	N/A
Lesbian, Gay & Bisexual People			
Women			
Men			
Transgendered People			
Black & Racial Minority People (please state which group)			
Older People (60+)			
Younger People (17-25) and Children  Please state male or female			
Religious / Faith Groups			
Deprived Groups			

**If you have rated any negative impact(s) as 'High' please go straight to Section 4 to complete a full assessment.**

**If you have rated any negative impact as 'Low' or 'Medium please complete the rest of this section on pages 9 and 10.**

**Guidance Note 3: How to assess negative impacts**

Low = It is not discriminatory according to current legislation. However, it might not be seen as being in line with best practice.

Medium = It is not discriminatory according to current legislation. However, it is not in line with the Trust or Department Equality Policy and/or Strategy and requires attention

High = It is discriminatory according to current anti-discrimination legislation (i.e. it is unlawful), and therefore requires immediate action.

**3.2 Please list below any actions that you plan to take as a result of any negative impact**

<b>Low or medium negative impact</b>	<b>Action required to remove or minimise the impact</b>	<b>Lead person</b>	<b>Timescale</b>	<b>Resource implications</b>	<b>Any other comments</b>

**3.3 Could you improve the positive impact(s)? Please explain how**

Not applicable at this stage.

**3.4 If you have identified no negative impact, then please explain how you reached that decision and provide reference to evidence (for example reviews undertaken, surveys, feedback, patient data verified etc)**

There is a lack of evidence on the efficacy and cost-effectiveness of homeopathic therapies, therefore measuring the positive or negative impact is inappropriate at this time.

**Thank you for completing the initial assessment (please email a copy of this report to [E&Dsupport@wirral.nhs.uk](mailto:E&Dsupport@wirral.nhs.uk))**

## Homeopathy Commissioning

**NEW INVESTMENT ASSESSMENT FORM** (This form should be completed for any new funding whether funded internally or externally to demonstrate how value for money will be achieved by the project/ proposal)

<b>1.</b>	<p><b>CONTACT DETAILS</b></p> <p>Lead Director: Cathy Gritzner / Fiona Johnstone</p> <p>Lead Manager: Helen Bromley / Teresa Owen</p>
<b>2.</b>	<p><b>DESCRIPTION OF INVESTMENT PROPOSAL</b></p> <p>This paper proposes a <b><u>disinvestment</u></b> in homeopathy services due to the lack of evidence of its efficacy and cost-effectiveness.</p>
<b>3.</b>	<p><b>SUMMARY OF COSTS OF THE PROPOSAL</b></p> <p>Not applicable</p>
<b>4.</b>	<p><b>COST SAVINGS</b></p> <p>£35, 270 annually</p>
<b>5.</b>	<p><b>DELIVERY PLAN</b></p> <p>Not applicable</p>
<b>6.</b>	<p><b>PATIENT AND STAKEHOLDER SUPPORT</b></p> <p>A recommendation has been made to PEC members to consider whether formal engagement with patients and other stakeholders regarding homeopathy services is required.</p>
<b>7.</b>	<p><b>RISK ASSESSMENT</b></p> <p>Not applicable</p>
<b>8.</b>	<p><b>ADDITIONAL BENEFITS</b></p> <p>Not applicable</p>
<b>9.</b>	<p><b>PERFORMANCE MANAGEMENT</b></p> <p>Not applicable</p>