



# **BLMK CCG Policy Alignment Public Consultation Summary Report**

**February 2022**

## ***Background***

As part of the process for coming together as a single Clinical Commissioning Group (CCG), Bedfordshire, Luton and Milton Keynes (BLMK) CCG reviewed place-based policies that required alignment. Three areas of policy alignment were identified that would require public consultation:

- Fertility Services
- Gluten-free food prescribing
- Pharmacy First Minor Ailment Scheme

The public consultation took place from 12 October 2021 through to 21 December 2021.

The consultation timeline allowed for a period of pre-consultation engagement prior to the public consultation. During the pre-consultation engagement period a draft Case for Change, draft survey and draft Quality Impact Assessments, Equality Assessments, Data Protection Impact Assessments (QIAEADPIA's) and proposed criteria for the Fertility Services Policy were created. All of these documents were reviewed during the pre-consultation engagement phase and the feedback received was incorporated into the final consultation documents.

## ***Public Consultation***

A consultation document was produced to explain the proposals being considered and the rationale for the CCG's preferred options. The document included a [link to the CCG website where the policy documents](#) for each of the former CCG areas could be viewed.

The document was made [available online](#), as a printed version, in [large print format](#) and in an [easy read format](#).

The survey was available online (on Survey Monkey) and in [print format](#). A [large print version](#) and [easy read version](#) were made available on the website and as printed documents on request.

In total 851 responses were received to the survey.

The consultation was promoted across Bedfordshire, Luton and Milton Keynes (BLMK) via local groups, stakeholders and voluntary organisations, GP practices and community pharmacies and via town and parish Councils. The consultation was also promoted online via the CCG website, social media and paid for social media posts.

In addition, three drop-in engagement events were held, two virtually and one in person.

## Consultation options

The options set out within the consultation are outlined below, the preferred option for each service area.

<b>Gluten-free food prescribing</b>	
<b>Option 1</b>	To withdraw the gluten-free bread and flour available on prescription in Luton, whilst ensuring patients at risk of dietary neglect are still able to access when appropriate, in line with Bedfordshire and Milton Keynes.
<b>Option 2</b>	To retain gluten-free bread and flour on prescription in Luton and provide the same access to gluten-free bread and flour in Bedfordshire and Milton Keynes.
<b>Preferred option</b>	To withdraw the gluten-free bread and flour available on prescription in Luton, whilst ensuring patients at risk of dietary neglect are still able to access when appropriate, in line with Bedfordshire and Milton Keynes.
<b>Pharmacy First Minor Ailment Scheme</b>	
<b>Option 1</b>	To withdraw the Pharmacy First Minor Ailment Scheme in Milton Keynes, to align this service with the current offering in Bedfordshire and Luton.
<b>Option 2</b>	To retain the Pharmacy First Minor Ailment Scheme in Milton Keynes and expand to include Bedfordshire and Luton.
<b>Preferred option</b>	To withdraw the Pharmacy First Minor Ailment Scheme in Milton Keynes, to align this service with the current offering in Bedfordshire and Luton.
<b>Specialist Fertility</b>	
<b>Option 1</b>	To reduce the current offer of three cycles of IVF to residents in Luton to one cycle for all eligible patients, in line with the current offering in Bedfordshire and Milton Keynes and extend access to the service for same sex female couples, single females and any person with a uterus (including trans men and non-binary people), who are currently unable to access fertility services under existing policies.
<b>Option 2</b>	To increase the number of cycles in Bedfordshire and Milton Keynes, to three cycles for all patients aged 39 and under, and one cycle for all eligible patients aged 40-42, in line with the current Luton model and extend access to the service for same sex female couples, single females and any person with a uterus (including trans men and non-binary people), who are currently unable to access fertility services under existing policies.
<b>Preferred option</b>	To reduce the current offer of three cycles of IVF to residents in Luton to one cycle for all eligible patients, in line with the current offering in Bedfordshire and Milton Keynes and extend access to the service for same sex female couples, single females and any person with a uterus (including trans men and non-binary people).

## Survey Results

In total 851 responses were received to the survey, not all respondents answered every question.

### Fertility Services

Of the 632 people who responded to the question on which of the proposed fertility services Options they preferred 82.3% selected Option 2 (to increase the number of cycles), 17.7% selected the CCG preferred Option 1 (to reduce the offer of three cycles of IVF in Luton in line with Bedfordshire and Milton Keynes).

Option Choice	Percent %
Option 1:	17.7
Option 2:	82.3

In addition to the responses in the survey we received the following feedback from key stakeholders;

#### **Bourn Hall, provider of Fertility Services**

Bourn Hall outline their view that a reduction in NHS entitlement will increase costs to the NHS as patients seek low cost treatment abroad with the potential of higher order multiple pregnancies and other complications of unregulated IVF. Data provided by Bourn Hall indicates that parenthood is optimised by the provision of up to 3 fresh cycles of IVF, they encourage BLMK CCG to provide this level of provision across BLMK.

#### **Fertility Network UK**

Fertility Network UK questioned the rationale for putting forward the 2 options in the consultation and why 2 cycles was not put forward as an option.

They urge the CCG to look carefully at NICE guidance and to establish a clear case which can be shared outlining the process and reasoning for any decisions, particularly decisions which do not follow the detailed advice of NICE on what is clinically and cost effective.

#### **Healthwatch Luton**

Healthwatch Luton agree with making fertility services available to a broader group of residents including those with protected characteristics, but do not agree that altering the cycle options for Luton residents from 3 cycles to 1 cycle.

They therefore do not support the policy alignment.

#### **Healthwatch Bedford Borough**

They note that these proposals are not disadvantageous to the people of Bedford and welcome the extension of fertility services to some people who were previously excluded.

Healthwatch Bedford Borough do not object to the preferred options, as specified in the consultation document.

### **Healthwatch Milton Keynes**

Healthwatch Milton Keynes agree in making fertility services available to a broader group of residents including those with protected characteristics but want to stress that the law is clear that these criteria should apply equally to opposite-sex and same-sex couples and it would be unlawful for this policy not to be broadened out.

Whilst they appreciate budgetary limitations, it is the position of Healthwatch Milton Keynes that fertility treatment should be offered in line with the NICE recommendations.

### **Bedford Borough Council Overview and Scrutiny Committee (BBC OSC)**

In terms of fertility services, there was an enhancement for Bedford Borough residents, as services would be expanded beyond heterosexual relationships.

Financial and demand pressures on the NHS were understood by the committee, however, this was an opportunity to increase services for residents within the Borough.

### ***Gluten-Free Food Prescribing (GFF)***

Of the 562 people who responded to the question on which of the proposed Options they preferred for gluten free foods prescribing 59.1% selected Option 2 (to retain gluten-free bread and flour on prescription in Luton and provide the same access in Bedfordshire and Milton Keynes), 40.9% selected the CCG preferred Option 1 (to withdraw gluten-free bread and flour on prescription in line with Bedfordshire and Milton Keynes).

Option Choice	%
Option 1:	40.9
Option 2:	59.1

In addition to the responses in the survey we received the following feedback from key stakeholders;

### **Coeliac UK**

Coeliac UK believe there is a compelling case for provision of gluten free bread and flour mix on prescription for those with a diagnosis of coeliac disease or dermatitis herpetiformis (DH) in the Bedfordshire, Luton and Milton Keynes (BLMK) area and strongly recommend the adoption of Option 2.

Coeliac UK have concerns as to the impact of withdrawal of provision (Option1) on the most vulnerable communities and are not persuaded that existing processes in place in Bedfordshire or Milton Keynes adequately support vulnerable members of the coeliac community to access gluten free prescribing support.

### **British Dietetic Association (BDA)**

The BDA provided a statement in response to the consultation which states that 'Coeliac disease is a condition that warrants the continued availability of staple GF foods on

prescription (such as breads, flour mixes and pasta). It is a lifelong autoimmune disease with serious complications associated with non-adherence to a GF diet. The ingestion of even small amounts of gluten causes damage to the lining of the small intestine leading to inflammation and malabsorption, and therefore subsequent nutritional deficiencies, in addition to an increased risk of osteoporosis, depression, infertility and malignancy.'

### **Bedfordshire Local Pharmaceutical Council**

Bedfordshire LPC state that gluten-free prescribing should be aligned across BLMK and agree that the provision of gluten-free bread and flour within the NHS, for those at risk of dietary neglect should continue, where medically appropriate.

### **Healthwatch Luton**

Healthwatch Luton do not support the policy alignment and feel the alignment will be a 'levelling down' for Luton residents.

Healthwatch Luton feel this alignment for coeliac residents in Luton will not provide an equal access – as the equity of numbers of coeliac patients linked with the higher deprivation is the placed-based reason for having prescriptions still available for Luton residents currently. They also raised concerns regarding the longer-term effect on patient's health if removing this option for Luton residents.

### **Healthwatch Bedford Borough**

Whilst they note that these proposals are not disadvantageous to the people of Bedford they do believe that any move to equalise access to services should follow the principle of levelling up and are disappointed that the preferred options will result in the withdrawal of some services from patients outside of Bedford Borough.

Healthwatch Bedford Borough do not object to the preferred options, as specified in the consultation document.

### **Healthwatch Milton Keynes**

It is the position of Healthwatch Milton Keynes that BLMK CCG should offer prescribing of gluten-free bread and flour mixes and align its policy position with that recommended by NHS England and the Department of Health and Social Care.

Healthwatch Milton Keynes state that it is not clear that patients in Milton Keynes will have the same access to gluten-free prescriptions, based on their financial circumstances as those patients in Bedfordshire and Luton following the alignment of policies. If in Milton Keynes patients continue to access gluten-free food prescriptions via the Individual Funding Request (IFR) process it is important to note that the IFR does not take an individual's financial circumstances into consideration, when reviewing the request resulting in inequity for Milton Keynes patients.

### **Bedford Borough Council Overview and Scrutiny Committee (BBC OSC)**

Members had been previously reassured by BLMK CCG that people on low incomes would continue to receive gluten free food prescriptions from their GP if they were unable to access gluten free foods from supermarkets within Bedford Borough.

## **Pharmacy First Minor Ailments**

Of the 538 people who responded to the question for Milton Keynes Pharmacy First Minor Ailment Scheme, on which of the proposed Options they preferred 79.6% selected Option 2 (to retain the scheme in Milton Keynes and extend it to Bedfordshire and Luton), 20.4% selected the CCG preferred Option 1 (to withdraw the scheme to align with Bedfordshire and Luton).

Option Choice	%
Option 1:	20.4
Option 2:	79.6

In addition to the responses in the survey we received the following feedback from key stakeholders;

### **Bedfordshire Local Pharmaceutical Council (LPC)**

Bedfordshire LPC state that an equitable scheme should be available to everyone across BLMK.

They note that patients referred to community pharmacy via the 111 CPCS service are required to pay for any over the counter medication recommended by the pharmacy. This may discourage patients from accessing CPCS and with restricted GP access could affect patient care.

Bedfordshire LPC recommends that if the MK Pharmacy First scheme is discontinued, the current spend of £25,011 is redirected into the provision of either over the counter medicines, where appropriate or prescription only medications supplied by the pharmacy under a Patient Group Direction (PGD.)

### **Healthwatch Bedford Borough**

Whilst they note that these proposals are not disadvantageous to the people of Bedford they do believe that any move to equalise access to services should follow the principle of levelling up and are disappointed that the preferred options will result in the withdrawal of some services from patients outside of Bedford Borough.

Healthwatch Bedford Borough do not object to the preferred options, as specified in the consultation document.

### **Healthwatch Milton Keynes**

They note that the Pharmacy First Scheme, launched in April 2018, and recent guidance from NHS England together with the National Community Pharmacy Consultation Scheme now places greater emphasis on the importance of self-care, but the Minor Ailments Scheme had the same aims, with the addition to recognise that people on low incomes may need more financial support to self-care.

Removing the service may mean more equal access to advice and over-the-counter medicine for all patients in BLMK it does mean that people on low incomes in Milton

Keynes, Bedfordshire and Luton will continue to face barriers to receiving equitable treatment and care.

### **Bedford Borough Council Overview and Scrutiny Committee (BBC OSC)**

BBC OSC stated this was an opportunity to increase health services in Bedford Borough to match those in Milton Keynes and Luton, however it was felt that the proposals had done the reverse and decreased services.

The committee noted that there would not be any detrimental effects on Bedford Borough residents as they did not have access to such services in the first place, however it was an opportunity for the CCG to upscale services that the Borough already had to match Milton Keynes and Luton.

### **Next Steps**

The full engagement report will be an appendix to the final report submitted to BLMK CCG's Governing Body to be held on 29 March 2022.