

Full Equality Impact Assessment (EIA)

<p>Service(s) under review:</p> <ul style="list-style-type: none"> • Male and female sterilisation • NHS prescribing – including gluten-free food prescriptions, over the counter prescribing, soya-based formula milk and travel vaccinations • Cosmetic procedures • Weight loss surgery. <p>This paper outlines the post engagement Equality Impact Assessment of BHR CCG s’ proposals on the listed procedures and follows on from the initial EIA completed before public engagement.</p>
<p>Date of equality analysis: 21/06/2017</p>
<p>Timescale for proposed changes: Subject to the approval of the Barking and Dagenham, Havering and Redbridge (BHR) CCGs’ governing bodies, it is anticipated any changes will come into effect in Summer 2017.</p>
<p>Equality analysis lead, job title and contact details Project Lead – Gulsen Gungor, Senior Commissioning Manager, NEL CSU (on behalf of Barking and Dagenham, Havering and Redbridge CCGs), G.Gungor@nhs.net</p>
<p>A brief description of the current service:</p> <p>Male and female sterilisation, cosmetic procedures, and weight loss surgery currently fall under the Procedures of Limited Clinical Effectiveness (POLCE) policy. At present, patients who meet the agreed criteria under the POLCE policy can access that treatment. Patients who do not meet the criteria for the procedure but can evidence an exceptional case can apply for funding via the Individual Funding Request (IFR) route, though this is not guaranteed to be approved.</p> <p>BHR CCGs currently offer gluten-free food prescriptions, soya based formula milk and travel vaccinations and over the counter prescribing to patients who are clinically eligible for these prescriptions.</p> <p>A brief description of proposed service changes:</p> <p>In the light of the current challenging financial situation for NHS bodies locally and nationally, the CCGs for Barking and Dagenham, Havering, and Redbridge carried out a consultation, <i>Spending NHS money wisely</i>. The consultation was made available on the CCGs’ websites and promoted across the three boroughs, encouraging local people to comment on their proposals. The eight week consultation closed on 18 May 2017. A consultation outcome report was</p>

developed and formed part of the evidence considered by the clinical leads to make recommendations for the BHR CCGs Governing body boards.

Will the proposed changes affect service users, staff or both? If the answer is “yes” detail how the changes will affect them?

Some service users will be affected by the proposed changes. Subject to BHR CCGs governing body approval, deciding to no longer fund these treatments or procedures would impact on previously eligible people who desire to have cosmetic surgery, sterilisation, and bariatric surgery. The proposal also includes stopping prescriptions for gluten-free food prescriptions, soya based formula milk and travel vaccinations and over the counter prescribing. The proposed changes will mean residents would not be able to have these treatments, or in the case of weight loss surgery, would have to meet certain criteria. All proposals would apply to all residents equally.

1. What is/will be the impact of your service review or proposed change (s) (positive and/or negative) in relation to the following nine protected characteristics:

The following people are protected by the Equality Act 2010:	Initial EIA assessment (April 2017)	Post- engagement EIA Assessment Details of any positive/negative impact (June 2017)
1)Age	Proposed service restriction/cessation would apply to all equally. This work-stream will not discriminate or impact on age	<p>Gluten free prescribing</p> <p>For gluten free foods, there will be no differential provision of this NHS service under these proposals which are to stop the supply of gluten free alternative foods for everyone.</p> <p>All groups will need to obtain gluten free alternative foods as the do the rest of their food shopping. These are currently widely available in supermarkets but less commonly in small convenience stores.</p> <p>The CCG acknowledges that this may have an impact on older or less mobile patients who do not currently access larger supermarkets either directly or on line.</p> <p>This proposal therefore may result in a change in shopping habits or a requirement for additional support from family and friends.</p> <p>Paracetamol and painkiller prescriptions</p> <p>BHR CCGs propose to stop funding paracetamol and painkiller prescriptions for acute need. The restriction applies to capsule and tablet form of painkillers only and children will continue to have the liquid form of</p>

		<p>these products. Patients with long term need due to chronic condition, paracetamol and painkillers will also continue to access these items via NHS prescribing.</p> <p>The change impacts adults with acute need for painkillers who would need to purchase these items in the future, however these products are widely available in pharmacies and supermarkets at a very low cost. Patients would be fully informed of this change through the various CCG communication materials.</p>
2)Disability	Proposed service restriction/cessation would apply to all equally. This work-stream will not discriminate or impact on disability	<p>Gluten free prescribing</p> <p>For gluten free foods there will be no differential provision of this NHS service under these proposals which are to stop the supply of gluten free alternative foods for everyone.</p> <p>All groups will need to obtain gluten free alternative foods as the do the rest of their food shopping. These are currently widely available in supermarkets but less commonly in small convenience stores.</p> <p>The CCG acknowledges that this may have an impact on patients with restricted mobility who cannot easily currently access larger supermarkets either directly or on line.</p> <p>This proposal therefore may result in a change in shopping habits or a requirement for additional support from family and friends.</p>
3)Ethnicity	Proposed service restriction/cessation would apply to all equally .This work-stream will not discriminate or impact on ethnicity	There will be no differential provision of NHS services resulting from the proposals, and no differential impact from restricting the service.
4)Gender	Proposed service restriction/cessation would apply to all equally. This work-stream will not discriminate or impacted on gender	<p>Male and Female sterilisation</p> <p>The scheme applies to both genders equally, however it may have an unintended impact on patients for whom all other alternative contraceptive therapies are clinically contraindicated or have not been effective in the past. This may also lead to increased unplanned pregnancies.</p>

		BHR CCGs recognise the potential unintended impact on both genders, and the IFR route will still be available for patients who are clinically not suitable for all other alternative contraceptive treatments or previous attempts of alternative options haven't been effective.
5)Sexual orientation	Proposed service restriction/cessation would apply to all equally. This work-stream will not discriminate or impact on by sexual orientation	There will be no differential provision of NHS services resulting from the proposals, and no differential impact from restricting the service.
6)Religion or belief	Proposed service restriction/cessation would apply to all equally. This work-stream will not discriminate or impacted on religion or belief	There will be no differential provision of NHS services resulting from the proposals, and no differential impact from restricting the service.
7)Gender re-assignment	Proposed service restriction/cessation would apply to all equally. This work-stream will not discriminate or impact on gender re-assignment	CCGs can confirm that the current routes for funding for this service is offered by the NHSE and provided via specialist Gender Dysphoria clinics as NHSE core offer. BHR CCG proposal related to cosmetic procedures will not change this funding availability and patients will still be able to access this service.
8)Pregnancy/ maternity	Proposed service restriction/cessation would apply to all equally .This work-stream will not discriminate or impact on pregnancy/maternity	There will be no differential provision of NHS services resulting from the proposals, and no differential impact from restricting the service.
9)Marriage/Civil partnership	Proposed service restriction/cessation would apply to all equally This work-stream will not discriminate or impact on marriage/civil partnership	There will be no differential provision of NHS services resulting from the proposals, and no differential impact from restricting the service.
2. Please detail below what the data and the results of consultations say about the impact of the proposed changes on any of the protected characteristics?		
Please see potential impact detail above under age, disability and gender above.		

3. What actions could be taken to minimise any negative impacts that have been identified?
Please see above actions for the potentially impacted characteristics.

4. Could any of the identified negative impacts have a direct (discriminatory) effect?	Yes – please see above impact on age caused by the paracetamol/painkiller prescribing restrictions	
5. If the answer is “Yes”, can this discrimination be justified/ explained? Please provide any evidence you have to support this.	The change impacts adults with acute need for painkillers who will need to purchase these items in the future, however these products are widely available in pharmacies and supermarkets at a very low cost. Patients will be fully informed of this change through the various CCG communication materials.	

Please identify any action required/taken, timescale and leads
<p>Please see mitigation actions for impacted areas above.</p> <p>For the remaining protected characteristics there will be no differential provision of NHS services resulting from the proposals, however BHR CCGs recognise there is an association between particular Disability/Ethnicity/Religion or Belief and poverty. As some of the affected services are available privately there will ultimately be differential access for these treatments.</p> <p>All proposals are subject to BHR CCGs governing body formal approval. BHR CCGs IFR policy will continue to offer the IFR route for all patients who present exceptionality.</p>

Form completed by:
<p>Gulsen Gungor Senior Commissioning Manager NEL CSU on behalf of Barking and Dagenham, Havering and Redbridge CCGs G.Gungor@nhs.net</p>