

**Questions raised by a Member of the Public for Norwich CCG Public
Governing Body Meeting - Tuesday 23rd July 2019**

Subject: Procedures of Limited Clinical Value

Norwich CCG is listed on the website Ration Watch (<http://www.rationwatch.co.uk/ccgs/>) as “rationing” hip and knee replacement and treatment for hernia and cataract, on the grounds that the CCG classifies them as Procedures of Limited Clinical Value. These treatments are considered effective by NICE.

Question 1

- A. *Is the website correct that NCCG is rationing these three treatments?*
- B. *Does Norwich CCG agree that its commissioning policy on specific treatments should comply fully with current NICE guidance, where it exists?*

If the answer to b) is “no”, please answer c), d) and e):

- C. *Why not?*
- D. *What other factors does Norwich CCG consider in addition to NICE guidance when formulating commissioning policy on specific treatments for which NICE guidance exists?*
- E. *What expertise does Norwich CCG possess which enables it to override the expert judgment of NICE guideline development committees in conducting systematic reviews of the available literature when formulating guidance on specific topics?*

Question 2

- A. *Is Norwich CCG already rationing, or considering rationing, any other treatments which are considered effective by NICE?*
- B. *If so, which ones?*

Question 3

- A. *Is Norwich CCG using, or considering using, a Referral Management Centre, a Commissioning Support Unit or other agency to screen referrals?*
- B. *If so, which one?*

NHS Norwich CCG's Response – July 2019

We do not accept the language of this question. There is no rationing of NHS health services. The NHS provides hip, knee, cataract and hernia surgery when clinically appropriate and according to well defined policies.

Question 1 A – No, the Rationwatch website is incorrect.

Hip and knee arthroplasty, cataract surgery and hernia surgery are not defined as “procedures of limited clinical value” by the NHS. They are procedures subject to clinical threshold policies, which define the circumstances under which these procedures are carried out to ensure optimum benefit to the individual patient concerned. Clinical threshold policies help clinicians identify patients who will truly benefit from the procedures, and distinguish those patients who may not benefit or may even be harmed by the procedures. The policies support clinicians and their patients in decision making about the best treatment for the patient.

It should be noted that clinical threshold policies are agreed and are consistently applied to patients across all of Norfolk and Waveney.

Question 1 B – Please refer to the response to Question 1C.

Question 1 C - NICE guidelines provide information that can inform decision making in the planning, resourcing and provision of medical services, interventions and treatments. They are not meant to be followed without consideration of the many other factors that can influence clinical management and decision making. It is particularly important that CCGs take into account the needs and priorities of their local population. These needs and priorities clearly vary from locality to locality and a degree of flexibility is recognised as being essential to effective treatment and service provision.

Questions 1 D and E - Clinical threshold policies in Norfolk and Waveney are developed and reviewed regularly by the Clinical Policy Development Group (CPDG). This group consists of clinical representation from each of the 5 CCGs as well as a strong public health presence, commissioners from the 5 CCGs, representatives from the 3 acute hospital trusts, administrative support and is chaired by a lay member.

When developing or reviewing clinical policies the following information is taken into account:

- Review of authoritative national guidelines. For example NICE, and reports from the Academic Royal Colleges.
- Systematic scientific literature reviews undertaken using the expertise of our colleagues based in Public Health.
- Benchmarking of policy against other CCG policies from around the country.
- Guidance and input from NHS England.
- Expert clinical opinion from our colleagues in secondary care.
- Opinion of the Clinical Reference Groups' clinicians from each of the 5 CCGs.
- Opinion from the clinicians on the CPDG.
- Invited speakers with expertise in the policies being considered.

- Where appropriate, expert legal advice is sought to ensure for example, there are no breaches of applicable legislation such as the Equality Act, Human Rights Act, Mental Health Act etc.

All clinical policies are subject to review and ratified by the Joint Strategic Commissioning Committee representing all 5 CCGs, before implementation.

Question 2 A - NHS Norwich CCG does not ration healthcare.

Question 2 B – Not applicable.

Question 3 A - NHS Norwich CCG does not use a referral management centre in relation to hip and/or knee replacement and hernia referrals. An RMC is only used for the management of cataract referrals for the purposes of offering patient choice.

Question 3 B – The North Norfolk Referral Management Service is used for the management of cataract referrals, however they do not have the ability to reject referrals.