Using NHS Money Wisely

Supporting Consistent Clinical Decision Making

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Will Huxter – Director of Strategy, North Central London CCGs

JHOSC February 6th 2018
What are we seeking to achieve?

- Supporting GPs in their clinical decision making by helping them make informed decisions using NCL Policy for Procedures of limited Clinical effectiveness (PoLCE)
- Ensuring we issue NCL policy which is evidence based, timely and easy to interpret for both GP and hospital doctors to support person-centred decisions about appropriate treatment
- Consistency across NCL through successful implementation and adoption of a single policy which supports using money wisely.
What is the backdrop?

- NHS spend in real terms increase by +3.7% a year on average since 1948
- Since 2010 the rate slowed to average +1.9% between 2014-2015 & 2020-21
- Main pressure 2017-2018 onwards, with a fall of -0.3% in 2019-20
- Universal need to use NHS money wisely
  - NCL Cluster PoLCE 2010
  - Enfield –PoLCE review 2016
  - London- ‘Choosing Wisely’ 2017
  - England NHSCC –‘Value Interventions Programme’ 2018
Enfield PoLCE review

Initially specific to Enfield

- Initiated prior to transformed NCL commissioning arrangements/joint working or STP
- Led to a process of consultation requested by Enfield HOSC

- With STP development, support for a consistent approach
- Clinical leadership recommending a consistent process

STP PoLCE work stream within review of elective pathways of care
Since the Enfield review

- The Enfield public consultation demonstrated the difficulty of meaningful consultation; complexity of medical terminology
- Debate around the requirement or value of this consultation
- Concern over inequity of 2\textsuperscript{nd} wave process
- Actual outcome is to \textbf{support consistent clinical decision making}
- If we agree to no public consultation, we can action this immediately

\textbf{Question of public consultation is only barrier to implementation of an updated unified NCL policy and working with clinicians to ensure it is adhered to}
Possible next steps

We propose that:

• Another public consultation is not undertaken
• We introduce a revised governance process
• Ensure a consistent clinically-led approach across all 5 boroughs in North Central London

Use the above to demonstrate:

• A transparent pathway through which to moderate any future proposals
• Ensure a consistent approach is adopted across NCL.
Possible next steps

• The North Central London CCGs now work to **support consistent clinical decision making** around the 11 procedures adopted in Enfield

• Note the scrutiny & ratification by the Health & Care Cabinet

• Make sure this is about clinical care

• Reinforce the importance of joint clinical decision making within the context of a meaningful person-centred conversation between doctor/patient

• Ensure clinicians are equipped with the evidence to support such conversations in a consistent manner
Referral Management systems – supporting clinical decision making

• What are they? How do they work?
• Why can they help?
• The current systems are historic and varied
• Borough-based decisions aimed at managing borough-specific issues
• Are clinically led; referrals guided by senior clinicians
• Can require significant investment because it is clinically led
• May offer an easier way to administer and monitor a policy
• Does not replace clinically-led care and good communication

Review of referral management processes is not in scope at the moment
Using NHS money wisely for drug treatments

- All NCL GP practices use decision-support software to guide prescribing
- Guidance obtained from NCL prescribing policy overseen by local GPs and pharmacists, providing peer-to-peer support.
- Policy content is driven by NICE.
- Governance process to review and develop policy and software content.

**Same principle NCL is adopting for procedures of limited clinical effectiveness**
Using NHS money wisely... when NICE guidance does not exist

- Policy changes are driven primarily by updates in NICE guidance
- Where no NICE guidance, or exceptional patient factors exist a decision is informed by expert evidence from specialist bodies
- Patient-centred care and joint decision making between a Doctor and patient are key
- An individual funding request is submitted
- A request goes to a panel of impartial clinical experts to make an informed decision on whether to approve treatment for that named patient
- The same process is followed for procedures or medicines which are outside of NICE Guidance or local policy
Going Forward...

taking a NCL wide approach

• We would like to align NCL to a single policy, identify inequities, and ensure the process minimizes any future reoccurrence

• Implement a new governance process & structure for policy maintenance (see appendix two)

• Implement a communication strategy to support policy application by GPs and hospital Doctors

• Implement a new monitoring & adherence process

• Apply a consistent approach to patient engagement
Final thought....

North London Partners is in a learning phase and it is critically important for us to bring issues such as policies to support clinicians on procedures of limited clinical effectiveness to JHOSC, to publically rehearse and be challenged on critical issues prior to implementation.

The STP benefits enormously from robust debate and discussion of our policies and their implementation..
Appendix One

Background
Using NHS Money Wisely

Supporting Clinical Decision Making

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- Ensuring we issue NCL policy which is evidence-based, timely and easy to interpret for both GP and hospital doctors to support person-centred decisions about appropriate treatment
- Consistency across NCL through successful implementation and adoption of Policy which supports using money wisely.
Evidence Based Practice

- Medicine has a constantly changing evidence base. Everyday Academic Journals throughout the world publish hundreds of articles, some of which reinforce current practice, others question it and some propose new and better forms of treatment.
- The quality of evidence varies significantly, as can its relevance to the NHS and the characteristics of our population.
- Organisations such as NICE are charged with reviewing evidence. Through guidelines, technology assessments, commissioning guides and economic evaluations, NICE will make its recommendations to inform the work of the NHS.
Pace of Change

• Clinicians can be slow to change their practice even when the evidence base is overwhelming and funding is available.
• Clinicians have a professional obligation to keep themselves up to date through continuing professional development which is monitored and a necessary part of their registration process.
• Many factors affect how Clinicians use and apply evidence in their clinical judgement. The constantly changing evidence base, can result in decisions being made using out of date information.
• Good clinical care is maintained when clinicians are able to refer to clinical guidelines with recommendations around best practice. This also reduces waste.
• Local health staff, including your local GP, district nurse, or pharmacist, do this already
How does the system support Clinicians to make the best treatment decisions

- Clinicians often follow set criteria when deciding on treatment options. Within the NHS, these are often based upon NICE guidance but other sources such as specialty best practice guidance or international guidelines are also used.
- Guidance requires interpretation to support its practical use in everyday clinical practice. NHS organisations will often produce policies, procedures, formularies, easy to use guides and training material to support clinicians. This is the case across NCL
How does the system support Clinicians to make the best treatment decisions?

- Four CCGs have referral management or decision support systems; The CCGs systems may have varying levels of complexity, but the same type of support for GPs is provided.
- Standardised templates based upon local policy are used to complete the referral information. The template guides the GP to include essential information for the referral process.
- Local GPs provide supervisory support by reviewing the referral requests, providing peer to peer guidance if required to interpret a referral criteria.
- Islington CCG does not have a referral management solution however GPs follow the same policies when referring using a decision support tool, ‘Map of Medicine’, but this is used with greater variability and less consistency.
We are already using NHS money wisely for drug treatments

- No one wants to take a drug they don’t really need as it may cause harm. The same goes for unnecessary treatments, especially when there are associated risks e.g. general anesthetics.
- NCL clinicians have developed a policy for colleagues to follow. This policy has identified procedures which *should not* be routinely carried out because of a limited evidence base that the procedure will actually benefit patients.
- This mirrors the established practice of using prescribing guidelines and drug formularies based upon NICE and other international resources which is common place in NCL.
Why has this topic become an issue now? The Enfield experience

- In 2017, Enfield CCG decided to go to public consultation on proposed changes to the current NCL policy. The intention was for the CCG to implement any changes only in Enfield.
- In Dec 2017, Enfield applied 11 updates to the policy as a result, but to date, they have not been applied in the remaining four CCGs.
Why has this topic become an issue now? Enfield lessons learned

- This consultation demonstrated how difficult it is to formally consult with the public on specific and at times highly specialist interventions in a way that was easy for the public to understand.
- The policy changes are driven by updates in NICE guidance. The changes were being driven by the need to ensure the policy was up to date when supporting GPs in their referrals and referral management platforms in their design.
Why has this topic become an issue now?

- Since Dec 2017, we have an inequity in the application of the policy across NCL
- The results of the Enfield public consultation had little impact on policy content as this is determined by NICE guidance and other validated clinical evidence. This is the underlying principle of good clinical practice.
- Consulting with local GPs across NCL and communicating updates to the policy effectively is more effective and an equitable use of resources
- Making sure GPs are informed, will improve communication of evidence to patients as part of joint decision making, about the appropriateness of treatments
Why has this topic become an issue?

• We want to use money wisely and make sure the NHS has the money for procedures that are known to be clinically effective.
• NCL policy for procedures of limited clinical effectiveness has been reviewed and is due for re-issue.
• Effective communication and implementation of the new policy across every GP practice and provider in NCL is vital.
• NCL will regularly update its policy as a result of a new internal process. A new pan-London ‘Spending Money Wisely’ initiative and a number of new NICE guidance is due in 2018.
Key issues for consideration

- The proposed consultation does not meet the legal requirement for public consultation (major service redesign or closure)
- The proposals are an alignment to current NICE guidance not a change to service. Patients will still receive the care they need.
- The public is the wrong audience – this is about getting GP’s and hospital doctors to apply up to date evidence in a consistent way, to support patients to make informed decisions about their care
- This is particularly in regard to surgical interventions and dermatology
- To conduct a public consultation would not be a wise use of NHS resources, time and money
It is worth remembering....

- Addressing variations in treatment can tackle the twin challenges of overuse (causing waste and harm) and underuse (causing inequity).
- In some instances ‘no treatment is the best treatment’ or ‘active treatment not the best option’ for population benefit.

  e.g. cosmetic procedures such as Correction of Hair Loss (including male pattern baldness)
What commitment can we make to JHOSC?

- Any changes to the NCL policy **must be brought to JHOSC** for advice and recommendations before being implemented.
- North London Partners conduct a comprehensive programme to inform, support and learn from GPs and providers in the practical implementation of updated NCL policy.
What are we asking for today?

The key issue is to get GPs to effectively utilise NCL policy on procedures of limited clinical effectiveness in a consistent way which supports using NHS money wisely.

We are asking JHOSC to advise, should we

*Hold a public consultation*, or

*Conduct a comprehensive GP engagement programme to support effective and consistent use of NCL Policy in daily clinical practice.*
Final thought....

North London Partners is in a learning phase and it is critically important for us to bring issues such as policies to support clinicians on procedures of limited clinical effectiveness to JHOSC, to publically rehearse and be challenged on critical issues prior to implementation.

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Appendix Two

Draft Governance Process
Using NHS Money Wisely
Procedures of Limited Clinical Effectiveness (PoLCE) Governance Process

NICE
Specialist organisations (including commissioners)
National "Value Interventions Programme"
International professional bodies/databases

London "spending money wisely"

Policy

PoLCE Steering Group

Collocate new evidence

Subject-specific task and finish group

Recommendation

Review with NCL Clinicians & Providers

Policy not changed
Policy updated

Health and Care Cabinet
Health and Care Cabinet

Reviewed by Provider bodies
Ratified by STP Joint Commissioning Committee (JCC)
Reviewed by STP Programme Delivery Board (PDB)

Consult with Joint Health & Overview Scrutiny Committee (JHOSC)

PoLCE Steering Group – issue updated NCL policy with supporting Communication and guidance to CCGs, GPs and Providers

ToRs
Membership – clinicians, commissioners, service managers
Scrutiny of policy
Oversight of the T&F groups
Vendor Control
Policy Issue
Patient Representation

ToRs
Membership – specialist clinicians
Scrutiny of subject specific policy, clinical practice, cost effectiveness, and evidence base
Seek feedback & review
Patient Representation