

Policy for Complementary and Alternative Therapies

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| Reference Number: | |
| Version: | Version 2 |
| Name of responsible Committee and date approved or recommended to Integrated Care Board: | Finance and Performance Committee |
| Date approved by the Integrated Care Board (if applicable): | 04 October 2023 |
| Next Review Date: | April 2026 |
| Expiry Date: | October 2026 |
| Name of author and title: | Lucy Dyde, IFR Manager |
| Name of reviewer and title: | Dr Mike Caley, Deputy Medical Director |
| Department: | Medical Directorate |

VERSION HISTORY

| Date | Version | Changes made to previous version | Consulting and Endorsing Stakeholders, Committees / Meetings / Forums etc. |
|------------|---------|----------------------------------------------------------------------|----------------------------------------------------------------------------|
| 05/04/2023 | V2 | <ul style="list-style-type: none"> Formatting changes | Clinical Commissioning Policy Development Group |
| | | | |

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1. Category: Not commissioned

2. Background

This commissioning policy has been produced in order to provide and ensure equity, consistency and clarity relating to the approach to complementary and alternative therapies by the Integrated Care Board (ICB).

The policy reflects the relative lack of high quality research data available to support the use of these therapies.

3. Commissioning position

Complementary and alternative therapies are not commissioned by the ICB as “stand-alone” treatments due to a paucity of information on clinical effectiveness.

In certain circumstances some of the procedures are commissioned as part of a broader contract with a mainstream provider (for example specialist pain management, oncology, palliative care and musculoskeletal [MSK] services) in a multi-disciplinary approach to symptom control.

The alternative and complimentary therapies and alternative disciplines covered by this policy include:

- Acupuncture
- Alexander Technique
- Anthroposophical medicine
- Aromatherapy
- Bach and other flower remedies
- Chinese herbal medicine
- Chiropractic
- Crystal therapy
- Dowsing
- Eastern medicine
- Healing Nutritional medicine
- Herbal medicine
- Hypnotherapy
- Iridology
- Kinesiology
- Maharishi Ayurvedic medicine
- Massage
- Meditation
- Naturopathy
- Neutralising Antigens/clinical ecology/environmental medicine
- Osteopathy
- Pilates
- Radionics
- Reflexology
- Shiatsu
- Traditional Chinese medicine
- Yoga

N.B. The alternative and complementary therapies/disciplines listed above are not exhaustive.

4. Equality and Quality Impact Assessment Tool

The following assessment screening tool will require judgement against all listed areas of risk in relation to quality. Each proposal will need to be assessed whether it will impact adversely on patients / staff / organisations.

Insert your assessment as positive (P), negative (N) or neutral (N/A) for each area.

Record your reasons for arriving at that conclusion in the comments column. If the assessment is negative, you must also calculate the score for the impact and likelihood and multiply the two to provide the overall risk score. Insert the total in the appropriate box.

Quality Impact Assessment

Quality and Equality Impact Assessment

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| Scheme Title: | Policy for Complementary and Alternative Therapies | | |
| Project Lead: | Lucy Dyde, IFR Team Manager | Senior Responsible Officer: | Dr Angela Brady |
| | | Quality Sign Off: | Mary Mansfield |
| Intended impact of scheme: | <p>To provide a fair, equitable and transparent process for all patients of the NHS Coventry and Warwickshire Integrated Care Board (ICB), for which the ICB has commissioning responsibility.</p> <p>The policy for Complementary and Alternative Therapies supports the objective to prioritise resources and provide interventions with the greatest proven health gain, within ICB budgetary constraints. The intention is to ensure equity and fairness in respect of access to NHS funding for interventions and to ensure that interventions are provided within the context of the needs of the overall population and the evidence of clinical and cost effectiveness.</p> | | |
| How will it be achieved: | Through the process detailed in this document. | | |

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| Name of person completing assessment: | Lucy Dyde |
| Position: | IFR Team Manager |
| Date of Assessment: | 05 April 2023 |

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| Quality Review by: | Mary Mansfield |
| Position: | Deputy Director of Nursing |
| Date of Review: | 16 May 2023 |

High level Quality and Equality Questions

The risk rating is only to be done for the potential negative outcomes. We are looking to assess the likelihood of the negative outcome occurring and the level of negative impact. We are also seeking detail of mitigation actions that may help reduce this likelihood and potential impact.

| AREA OF ASSESSMENT | | OUTCOME ASSESSMENT (Please tick one) | | | Evidence/Comments for answers | Risk rating (For negative outcomes) | | | Mitigating actions |
|-----------------------------------------------------------------------------------------------------|----------------------------------------------------|-----------------------------------------|----------|---------|-------------------------------|----------------------------------------|------------------------|---------------------|--------------------|
| | | Positive | Negative | Neutral | | Risk impact (I) | Risk likelihood (L) | Risk Score (IxL) | |
| Duty of Quality Could the scheme impact positively or negatively on any of the following: | Effectiveness – clinical outcome | | | ✓ | | | | | |
| | Patient experience | | | ✓ | | | | | |
| | Patient safety | | | ✓ | | | | | |
| | Parity of esteem | | | ✓ | | | | | |
| | Safeguarding children or adults | | | ✓ | | | | | |
| NHS Outcomes Framework Could the scheme impact positively or negatively on the | Enhancing quality of life | | | ✓ | | | | | |
| | Ensuring people have a positive experience of care | | | ✓ | | | | | |

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| delivery of the five domains: | | | | | | | | | |
| | Preventing people from dying prematurely | | | ✓ | | | | | |
| | Helping people recover from episodes of ill health or following injury | | | ✓ | | | | | |
| | Treating and caring for people in a safe environment and protecting them from avoidable harm | | | ✓ | | | | | |
| Patient services Could the proposal impact positively or negatively on any of the following: | A modern model of integrated care, with key focus on multiple long-term conditions and clinical risk factors | | | ✓ | | | | | |
| | Access to the highest quality urgent and emergency care | | | ✓ | | | | | |
| | Convenient access for everyone | | | ✓ | | | | | |
| | Ensuring that citizens are fully included in all aspects of service design and change | | | ✓ | | | | | |
| | Patient Choice | | | ✓ | | | | | |
| | Patients are fully empowered in their own care | | | ✓ | | | | | |
| | Wider primary care, provided at scale | | | ✓ | | | | | |
| Access Could the proposal | Patient choice | | | ✓ | | | | | |

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| impact positively or negatively on any of the following: | Access | | | ✓ | | | | | |
| | Integration | | | ✓ | | | | | |
| Compliance with NHS Constitution | Quality of care and environment | | | ✓ | | | | | |
| | Nationally approved treatment/drugs | | | ✓ | | | | | |
| | Respect, consent and confidentiality | | | ✓ | | | | | |
| | Informed choice and involvement | | | ✓ | | | | | |
| | Complain and redress | | | ✓ | | | | | |

*Risk score definitions are provided in the next section.

Equality Impact Assessment

Project / Policy Details

What is the aim of the project / policy?

To provide a fair, equitable and transparent process for all patients of the NHS Coventry and Warwickshire Integrated Care Board (ICB), for which the ICB has commissioning responsibility.

The policy for Complementary and Alternative Therapies supports the objective to prioritise resources and provide interventions with the greatest proven health gain, within ICB budgetary constraints. The intention is to ensure equity and fairness in respect of access to NHS funding for interventions and to ensure that interventions are provided within the context of the needs of the overall population and the evidence of clinical and cost effectiveness.

Who will be affected by this work? e.g staff, patients, service users, partner organisations etc.

Patients

Is a full Equality Analysis Required for this project?

Yes

Proceed to complete this form.

No

Explain why further equality analysis is not required.

If no, explain below why further equality analysis is not required. For example, the decision concerned may not have been made by the ICB or it is very clear that it will not have any impact on patients or staff.

Equality Analysis Form

1. Evidence used

What evidence have you identified and considered? This can include national research, surveys, reports, NICE guidelines, focus groups, pilot activity evaluations, clinical experts or working groups, JSNA or other equality analyses.

No new evidence since the adoption of this policy by the ICB in July 2022.

2. Impact and Evidence:

In the following boxes detail the findings and impact identified (positive or negative) within the research detailed above; this should also include any identified health inequalities which exist in relation to this work.

Age: A person belonging to a particular age (e.g. 32 year olds) or a range of ages (e.g. 18-30 year olds)

This policy does not contain any statements which may exclude clinicians of the NHS Coventry and Warwickshire Integrated Care Board from applying this policy.

Disability: A person has a disability if he/she has a physical, hearing, visual or mental impairment, which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities

This policy does not contain any statements which may exclude clinicians of the NHS Coventry and Warwickshire Integrated Care Board from applying this policy.

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| Gender reassignment (including transgender): Where a person has proposed, started or completed a process to change his or her sex. |
| This policy does not contain any statements which may exclude clinicians of the NHS Coventry and Warwickshire Integrated Care Board from applying this policy. |
| Marriage and civil partnership: A person who is married or in a civil partnership. |
| This policy does not contain any statements which may exclude clinicians of the NHS Coventry and Warwickshire Integrated Care Board from applying this policy. |
| Pregnancy and maternity: A woman is protected against discrimination on the grounds of pregnancy and maternity. With regard to employment, the woman is protected during the period of her pregnancy and any statutory maternity leave to which she is entitled. Also, it is unlawful to discriminate against women breastfeeding in a public place. |
| This policy does not contain any statements which may exclude clinicians of the NHS Coventry and Warwickshire Integrated Care Board from applying this policy. |
| Race: A group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins. |
| This policy does not contain any statements which may exclude clinicians of the NHS Coventry and Warwickshire Integrated Care Board from applying this policy. |
| Religion or belief: A group of people defined by their religious and philosophical beliefs including lack of belief (e.g. atheism). Generally a belief should affect an individual's life choices or the way in which they live. |
| This policy does not contain any statements which may exclude clinicians of the NHS Coventry and Warwickshire Integrated Care Board from applying this policy. |
| Sex: A man or a woman |
| This policy does not contain any statements which may exclude clinicians of the NHS Coventry and Warwickshire Integrated Care Board from applying this policy. |
| Sexual orientation: Whether a person feels generally attracted to people of the same gender, people of a different gender, or to more than one gender (whether someone is heterosexual, lesbian, gay or bisexual). |
| This policy does not contain any statements which may exclude clinicians of the NHS Coventry and Warwickshire Integrated Care Board from applying this policy. |
| Carers: A person who cares, unpaid, for a friend or family member who due to illness, disability, a mental health problem or an addiction cannot cope without their support |
| This policy does not contain any statements which may exclude clinicians of the NHS Coventry and Warwickshire Integrated Care Board from applying this policy. |
| Other disadvantaged groups: |
| This policy does not contain any statements which may exclude clinicians of the NHS Coventry and Warwickshire Integrated Care Board from applying this policy. |

3. Human Rights

| FREDA Principles / Human Rights | Question | Response |
|-------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Fairness – Fair and equal access to services | How will this respect a person's entitlement to access this service? | <p>To provide a fair, equitable and transparent process for all patients of the NHS Coventry and Warwickshire Integrated Care Board (ICB), for which the ICB has commissioning responsibility.</p> <p>The policy for Complementary and Alternative Therapies supports the objective to prioritise resources and provide interventions with the greatest proven health gain, within ICB budgetary constraints. The intention is to ensure equity and fairness in respect of access to NHS funding for interventions and to ensure that interventions are provided within the context of the needs of the overall population and the evidence of clinical and cost effectiveness.</p> |
| Respect – right to have private and family life respected | How will the person's right to respect for private and family life, confidentiality and consent be upheld? | The patient will not be contacted by the ICB. If the patient contacts the ICB of their own accord then all communication, written or verbal, will be provided in a confidential, clear, understandable, format. |
| Equality – right not to be discriminated against based on your protected characteristics | How will this process ensure that people are not discriminated against and have their needs met and identified? | This policy is applied to all patients of the NHS Coventry and Warwickshire Integrated Care Board to prioritise resources and provide interventions with the greatest proven health gain, within ICB budgetary constraints. The intention is to ensure equity and fairness in respect of access to NHS funding for interventions and to ensure that interventions are provided within the context of the needs of the overall population and the evidence of clinical and cost |

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| | | effectiveness. |
| Dignity – the right not to be treated in a degrading way | How will you ensure that individuals are not being treated in an inhuman or degrading way? | All communication, written or verbal, will be provided in a confidential, clear, understandable, format. |
| Autonomy – right to respect for private & family life; being able to make informed decisions and choices | How will individuals have the opportunity to be involved in discussions and decisions about their own healthcare? | Individuals will have the opportunity to discuss their healthcare with the requesting clinician. If the patient contacts the ICB of their own accord then all communication, written or verbal, will be provided in a confidential, clear, understandable, format. |
| Right to Life | Will or could it affect someone's right to life? How? | No |
| Right to Liberty | Will or could someone be deprived of their liberty? How? | No |

4. Engagement, Involvement and Consultation

If relevant, please state what engagement activity has been undertaken and the date and with which protected groups:

| Engagement Activity | Protected Characteristic/ Group/ Community | Date |
|---------------------|--------------------------------------------|------|
| N/A | N/A | N/A |

For each engagement activity, please state the key feedback and how this will shape policy / service decisions (E.g. patient told us So we will):

N/A

5. Mitigations and Changes

Please give an outline of what you are going to do, based on the gaps, challenges and opportunities you have identified in the summary of analysis section. This might include action(s) to mitigate against any actual or potential adverse impacts, reduce health inequalities, or promote social value. Identify the **recommendations** and any **changes** to the proposal arising from the equality analysis.

N/A

6. How will you measure how the proposal impacts health inequalities?

e.g Patients with a learning disability were accessing cancer screening in substantially lower numbers than other patients. By revising the pathway the ICB is able to show increased take up from this group, this is a positive impact on health inequalities.

You can also detail how and when the service will be monitored and what key equality performance indicators or reporting requirements will be included within the contract.

Activity is monitored through Acute Contracting/Business Intelligence. This is a policy where the intervention is not commissioned and therefore any activity would be investigated and challenged through the appropriate ICB channels.

7. Is further work required to complete this assessment?

Please state what work is required and to what section. e.g additional consultation or engagement is required to fully understand the impact on a particular protected group (e.g disability).

| Work needed | Section | When | Dare completed |
|-------------|---------|------|----------------|
| N/A | N/A | N/A | N/A |
| | | | |

8. Sign off

The Equality Analysis will need to go through a process of **quality assurance** by a Senior Manager within the department responsible for the service concerned before being submitted to the Policy, Procedure and Strategy Assurance Group for approval. Committee approval of the policy / project can only be sought once approval has been received from the Policy, Procedure and Strategy Assurance Group.

| Requirement | Name | Date |
|--------------------------------------------------------------------------|---------------------------|------------|
| Senior Manager Signoff | Michael Caley, Deputy CMO | 27.04.2023 |
| Which committee will be considering the findings and signing off the EA? | F&P | 04.10.2023 |
| Approved by the Policy Procedure and Strategy Assurance Group. | | |

Once complete, please send to the ICB's Governance Team.