

Conditions for which over the counter (OTC) items should not routinely be prescribed in primary care

HRW Commissioning Position

Introduction

This commissioning position builds on previous advice we have issued to practices regarding prescribing medicines which may be purchased OTC. It links to the Department of Health and Social Care's self-care programme, which is designed to promote individuals to take responsibility to develop, protect, maintain and improve their own health and wellbeing. HRW CCG endorses the following statement by the Self Care Forum (6):

“Empowering people with the confidence and information to look after themselves when they can, and visit the GP when they need to, gives people greater control of their own health and encourages healthy behaviours that help prevent ill health in the long-term. In many cases people can take care of their minor ailments, reducing the number of GP consultations and enabling GPs to focus on caring for higher risk patients”.

Summary

- In March 2018 NHS England published the document ‘Conditions for which over the counter items should not routinely be prescribed in primary care’.
- HRW CCG fully supports local implementation of all the recommendations in the report and would ask and support all prescribers to follow the guidance in its entirety.
- There is a list of general exceptions (appendix 1) which apply to all the conditions/products listed **except** the items of limited clinical effectiveness.
- For vitamins, minerals, probiotics and those self-limiting conditions where there is limited evidence of clinical effectiveness e.g. OTC items for cough, sore throat and infant colic, then the general exceptions do not apply.
- Each condition/product also has a list of specific exceptions which apply only to that condition or product (see NHS England document for full details). (2)
- This guidance does not remove the clinical decision of a prescriber or override the NHS regulations.
- It should be considered that access to pharmacies and other outlets may be more difficult in our rural areas.

Background

In the year prior to June 2017, the NHS spent approximately £569 million on prescriptions for medicines which could otherwise be purchased over the counter (OTC) from a pharmacy and/or other outlets such as petrol stations or supermarkets.

The national guidance advises that prescriptions should not be routinely issued for 37 different conditions or products consulted on by NHS England and divides the rationale into three categories:

- Items of limited clinical effectiveness
- Self-limiting conditions
- Minor conditions suitable for self-care

HRW Clinical Commissioning Group aims to ensure that only treatments that are clinically effective and provide a clear health benefit to patients are prescribed on NHS prescriptions.

Guidance

An increasing range of medicines are available for purchase and it is requested that patients will be advised to purchase such medicines rather than receiving an NHS prescription. This is particularly the case for the self-limiting or minor conditions listed by NHS England.

This guidance is **not** aimed at patients who require medicines for long term conditions e.g. a patient with rheumatoid arthritis who is prescribed regular paracetamol.

If a prescriber advises a patient to purchase a medicine (without an NHS prescription) the prescriber may code this advice in the patient's clinical records. This is in line with the General Medical Council definition of prescribing: "Prescribing is used to describe many related activities, including supply of prescription only medicines, prescribing medicines, devices and dressings on the NHS and advising patients on the purchase of over the counter medicines and other remedies. It may also be used to describe written information provided for patients (information prescriptions) or advice given". (5)

This guidance applies to all patients, including those who would be exempt from paying prescription charges, unless they fall under either the general exceptions in appendix 1 or the condition/product specific exceptions outlined in the guidance document.

However, if a prescriber believes that a patient meets one of these exception criteria then treatment may be prescribed on the NHS.

References and Practice Resources

1. NHS England: Patient information leaflet 'Prescribing of over the counter medicines is changing'
<https://www.england.nhs.uk/publication/prescribing-of-over-the-counter-medicines-is-changing/>
2. NHS England: Conditions for which over the counter items should not routinely be prescribed in primary care: Guidance for CCGs
<https://www.england.nhs.uk/publication/conditions-for-which-over-the-counter-items-should-not-routinely-be-prescribed-in-primary-care-guidance-for-ccgs/>
3. NHS England: Conditions for which over the counter items should not routinely be prescribed in primary care: Frequently asked questions
<https://www.england.nhs.uk/publication/conditions-for-which-over-the-counter-items-should-not-be-routinely-prescribed-in-primary-care-frequently-asked-questions/>
4. PrescQIPP: Self-care and over the counter items: A quick reference guide
<https://www.prescqipp.info/media/3728/b227-self-care-and-otc-items-quick-reference-guide-20.pdf>
5. General Medical Council: Good practice in prescribing and managing medicines and devices 2013
<https://www.gmc-uk.org/ethical-guidance/ethical-guidance-for-doctors/prescribing-and-managing-medicines-and-devices>
6. Self Care Forum
<http://www.selfcareforum.org/about-us/what-do-we-mean-by-self-care-and-why-is-good-for-people/>

HRW CCG

October 2018

Appendix 1: General Exceptions to the Guidance.

There are certain scenarios where patients should continue to have their treatments prescribed and these are outlined below:

- Patients prescribed an OTC treatment for a long term condition e.g. regular pain relief for chronic arthritis or treatments for inflammatory bowel disease. This does not include long term conditions which are also classified as minor conditions e.g. mild to moderate hay fever.
- For the treatment of more complex forms of minor illnesses e.g. severe migraines that are unresponsive to over the counter medicines.
- For those patients that have symptoms that suggest the condition is not minor i.e. those with red flag symptoms; for example indigestion with very bad pain.
- Treatment for complex patients e.g. immunosuppressed patients.
- Patients prescribed OTC products to treat an adverse effect or symptom of a more complex illness and/or prescription only medications.
- Patients requiring treatments that are prescription only medicines.
- Circumstances where the product licence doesn't allow the product to be sold over the counter to certain groups of patients. This may vary by medicine, but could include babies, children and/or women who are pregnant or breast-feeding. In addition, some indications may not allow OTC sale e.g. hydrocortisone cream applied to the face.
- Patients with a minor condition suitable for self-care that has not responded sufficiently to treatment with an OTC product.
- Patients where the clinician considers that the presenting symptom is due to a condition that would not be considered a minor condition.
- Circumstances where the prescriber believes that in their clinical judgement, exceptional circumstances exist that warrant deviation from the recommendation to self-care.

- Individual patients where the clinician considers that their ability to self-manage is compromised as a consequence of medical, mental health or significant social vulnerability to the extent that their health and/or wellbeing could be adversely affected, if reliant on self-care. To note that being exempt from paying a prescription charge does not automatically warrant an exception to the guidance.
- Consideration should also be given to safeguarding issues (including, but not limited to, children); particularly if there are concerns that treatment might otherwise not be provided.