

Equality Impact and Risk Assessments

DRAFT Pan Merseyside Policy Review - Transanal Irrigation Policy.

Midlands and Lancashire CSU

Current Status

Stage 1 Suspended

Review Date

06/03/2018

Person Responsible

Harinder Sanghera

Service

Policy for Transanal Irrigation.

Service Area

Individual Funding Request / Individual Patient
Activity Procedure for Lower Clinical Value

Project Lead

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Explanation

This is a new policy for the treatment of Transanal Irrigation. This treatment has never been formally commissioned in Pan Merseyside and Warrington CCGs but G.Ps are prescribing nearly £1 million worth of these products per year. At the moment, there is no criteria in place for its use. Transanal Irrigation treatment is usually given to patients who experience bowel incontinence or constipation in line with NICE guidance. This assessment is based on a new policy to provide criteria for funding this treatment through the CCG's. Transanal Irrigation is a way of facilitating the evacuation of faeces from the bowel by introducing water (or other fluids) into the colon via the anus in a quantity sufficient to reach beyond the rectum. It is thought to result in an emptying of the descending colon as well as the sigmoid and rectum. Due to the volume of fluid used, the procedure is conducted over the toilet or commode. NICE guidance states that it should not be carried out within Primary Care. The CCG's that are part of this review are: NHS Halton Clinical Commissioning Group NHS Liverpool Clinical Commissioning Group NHS St Helens Clinical Commissioning Group NHS South Sefton Clinical Commissioning Group NHS Southport and Formby Clinical Commissioning Group NHS Warrington Clinical Commissioning Group This assessment has been carried out by Equality and Inclusion Business Partner at MLCSU – Jennifer Mulloy.

Assessment

Equality Impact

1	Does this issue plan to withdraw a service, activity or presence?	
No: this is a new policy.		
2	Does this issue plan to reduce a service, activity or presence?	
No: this is a new policy that provides criteria for transanal irrigation. This is a new policy and therefore the introduction of criteria may potentially reduce the number of people currently receiving this treatment.		
3	Does this issue plan to introduce or increase a charge for Service?	
No: there is no plan to introduce a charge for patients. The proposed policy v1 states that treatment is for patients with neurogenic bowel dysfunction.		
4	Does this issue plan to make a change to a commissioned service?	
Possibly - the policy provides criteria for patients accessing the current Transanal Irrigation treatment. This may affect patients with certain conditions that currently get access to this treatment.		
5	Does this issue plan to introduce, review or change a policy, strategy or procedure?	
Yes: this is a new policy. It provides criteria for patients all ages and currently in v1 the criteria is for patients with neurogenic bowel dysfunction. There may be other groups of people that may be clinically suitable - this will be further explored within clinical review work / engagement. The policy development has been guided by NICE : Medical technologies guidance [MTG36] Published date: February 2018. There is no current policy in place however the treatment is prescribed for patients. It is possible that there is variation in the appropriate use of the treatment with different providers.		

6	Does this issue plan to introduce a new service or activity?	
No - this is a new policy.		
7	Is this primarily about improving access to, or delivery of a service?	
No- however the policy will help clinicians provide consistency within Merseyside and Warrington CCG's.		
8	Does this affect Employees or levels of training for those who will be delivering the service?	
Yes: potentially. If this treatment was to be provided within primary care settings it may require staff training. NICE guidance states that this treatment should not be provided by G.Ps in primary care without specialist management.		
9	Does this issue affect Service users?	
Yes: this policy will affect patients with neurogenic bowel dysfunction and possibly other groups of patients with bowel problems.		
10	Can you foresee a negative impact on any Protected Characteristic Group(s)? <i>If YES please state what these could be.</i>	
Possibly this may impact on people within the protected characteristic of Disability. People with neurogenic bowel dysfunction may benefit from accessing this treatment (where conservative methods have failed). These people may have spinal cord injuries, spina bifida, MS or Parkinsons. This group would fall under the protected characteristic of disability. The current policy (v1) does not include other groups of people with non neurogenic bowel dysfunction. These may include people with rectal / bowel injuries, slow transit constipation or obstructive defaecation symptoms. There is no NICE guidance on managing bowel dysfunction in children.		

Equality Risk

11	<p>Have you got any general intelligence (research, consultation, etc.)? <i>If YES please list any related documents.</i></p>	
<p>Yes: https://www.nice.org.uk/guidance/mtg36/chapter/3-Evidence (February 2018)</p>		
12	<p>Have you got any specific intelligence (research, consultation, etc.)? <i>If YES please list any related documents.</i></p>	
<p>Yes: the policy development group have discussed that there is limited information on this treatment. A trial of 87 patients took place - which is cited within the NICE guidance. Information is also on https://www.nursingtimes.net/transanal-irrigation-for-bowel-management/199732.article. https://www.nhs.uk/conditions/constipation/ https://emedicine.medscape.com/article/321172-treatment#d9</p>		
13	<p>Have you taken specialist advice? (Legal, E&I Team, etc). <i>If YES please state.</i></p>	
<p>Yes: this policy is still under review and further advice is sought from the Aintree Heathy Bowel Clinic and clinical stakeholders. Equality and Inclusion advice is available.</p>		
14	<p>Have you considered your Public Sector Equality Duty? <i>Please provide a rationale.</i></p>	
<p>Yes - this is ongoing as the policy development work is considering other groups with non neurogenic bowel dysfunction. Further engagement work is planned.</p>		
15	<p>Do you plan to publish your information? <i>Include any "Decision Reports"</i></p>	
<p>Yes: this assessment will be available to the public.</p>		
16	<p>Can you minimise any negative effect? <i>Please state how.</i></p>	
<p>Yes: Further engagement with clinicians and the public will be carried out.</p>		

17	Do you have any supporting evidence? <i>If YES please list the documents.</i>	
No: awaiting further clinical review.		
18	Have you/will you engage with affected staff and users on these proposals?	
Yes: this is planned.		

Human Rights Impact

19	Will the policy/decision or refusal to treat result in the death of a person?	
No. The policy criteria is focused at funding this treatment for patients that are clinically suitable. Further work is planned within the development of the policy for non neourgenic bowel dysfunction patients that may possibly benefit from transanal irrigation.		
20	Will the policy/decision lead to degrading or inhuman treatment?	
No. The policy should not lead to degrading or inhuman treatment.		
21	Will the policy/decision limit a person's liberty?	
No. The policy should not limit a person's liberty.		
22	Will the policy/decision interfere with a person's right to respect for private and family life?	
No. The policy should not interfere with a person's right to respect for private and family life.		
23	Will the policy/decision result in unlawful discrimination?	

<p>No. The policy should not lead to unlawful discrimination. Further assessment work will be carried out alongside engagement with clinicians to ensure that all patients that are clinically suitable have access to this treatments.</p>		
24	<p>Will the policy/decision limit a person's right to security?</p>	
<p>No. The policy should not limit a person's right to security.</p>		
25	<p>Will the policy/decision breach the positive obligation to protect human rights?</p>	
<p>No. The policy should not breach human rights.</p>		
26	<p>Will the policy/decision limit a person's right to a fair trial (assessment, interview or investigation)?</p>	
<p>No. The policy should not limit a person's right to a fair assessment.</p>		
27	<p>Will the policy/decision interfere with a person's right to participate in life?</p>	
<p>No. The policy should not interfere with a person's right to participate in life.</p>		

Stage 2 Details

Equality Policies

No files uploaded

Equality Other

No files uploaded

Human Rights

No files uploaded

Additional Files

No files uploaded

Comments

Assessment Comment

V1 of the policy (20/4/18) still in development. Issue of other suitable groups / conditions to be clarified as this may deviate from NICE. A stage 2 EIRA will be carried out. Shared stage 1 with policy author - HD. Feedback has informed this EIA.

14/05/2018

MULLOY, JENNIFER

Approval Comment

Stage 2 recommended. Explore possible link with other bowel disorders that may have impact on mental health also.

14/05/2018

MULLOY, JENNIFER

Stage 2 Comment

No comment saved

Last Activation Comment

No comment saved

Last Deactivation Comment

No comment saved