
BRISTOL, NORTH SOMERSET AND SOUTH GLOUCESTERSHIRE CCGS - REVIEW OF HOMEOPATHIC SERVICES AND TREATMENTS

Response from Humanists UK, March 2018

ABOUT HUMANISTS UK

At Humanists UK, we want a tolerant world where rational thinking and kindness prevail. We work to support lasting change for a better society, championing ideas for the one life we have. Our work helps people be happier and more fulfilled, and by bringing non-religious people together we help them develop their own views and an understanding of the world around them. Founded in 1896, we are trusted by over 65,000 members and supporters to promote humanism. Through our ceremonies, pastoral support, education services, and campaigning work, we advance free thinking and freedom of choice so everyone can live in a fair and equal society.

Humanists UK has long campaigned against state funding of homeopathy and other 'complementary and alternative medicines' (CAM). In 2017, we responded to a consultation by the Charity Commission where we argued that by failing to provide evidence that their treatments are efficacious in advancing health, organisations who promote 'CAM' remedies fall short of what is required for charitable status. We also work closely with the Good Thinking Society - a charity set up to challenge NHS funding of CAM - whose founder Simon Singh is also a patron of Humanists UK. In 2017, Humanists UK responded to a consultation held by NHS England in support of a recommendation to end funding for all homeopathic and herbal treatments in primary care. In November 2017, the board of NHS England not only upheld this recommendation, but suggested that homeopathy should be added to the NHS' 'blacklist' of treatments.

Introduction to the consultation

The aim is to review commissioning of homeopathy services and treatments and includes three proposal options:

1. whether the homeopathy service should continue under the current policy where funding will be granted if the patient meets published criteria or,
2. whether the current policy should be amended to reduce access either by reducing the number of appointments routinely funded or to restrict the access criteria so that fewer patients will qualify for treatment or
3. whether NHS funded homeopathy is only available in rare and exceptional circumstances and would need to be approved by the Individual Funding Request Panel

Response to consultation questions

- 1. The homeopathy service should continue under the current policy where funding granted if the patient meets the published criteria?**

Strongly disagree

2. The current policy should be amended to reduce access, either by reducing the number of appointments routinely funded or by restricting the access criteria so fewer patients will qualify for treatment

Strongly disagree

3. NHS funded homeopathy is only available in rare and exceptional circumstances and would need to be approved by the Individual Funding Request Panel (IFR)

Strongly agree

4. What is the first half of your postcode?

EC1V

5. Do you have any other comments

We recommend that Bristol, North Somerset and South Gloucestershire CCGs bring their policy on funding homeopathy in line with the recommendation of the Science and Technology Select Committee in 2010¹ and NHS England in 2017. In England, only these three CCGs have failed to implement this recommendation and continue to fund homeopathic treatments. NHS Wirral and NHS Liverpool recently ceasing to support these remedies after the legality of their decision to continue funding was challenged².

It is worth noting that the Board of NHS England in November 2017 recommended not only that homeopathy prescriptions should be removed from primary care, but made a further recommendation to the Secretary of State for Health that these treatments should be formally placed on the 'blacklist'.³ We recommend that Bristol, North Somerset and South Gloucestershire bring its own provisions for homeopathic services in line with the recommendations from NHS England.

In putting forward this proposal it is important to consider whether it has an impact upon the NHS's duties under the Equality Act 2010. Some individuals or organisations that use or promote homeopathy may claim that these recommendations would amount to indirect discrimination on the grounds of religion and belief. This argument is centered on the premise that this

¹ House of Commons Science and Technology Committee, Evidence Check 2: Homeopathy: Fourth Report of Session 2009–10:

<https://www.publications.parliament.uk/pa/cm200910/cmselect/cmsctech/45/45.pdf>

² <https://goodthinkingsociety.org/nhs-wirral-ccg-ends-funding-for-homeopathy/>

³ NHS England Board Paper 30.11.2018

<https://www.england.nhs.uk/wp-content/uploads/2017/11/05-pb-30-11-2017-items-which-should-not-be-routinely-prescribed-in-primary-care.pdf>

characteristic includes the protection of philosophical beliefs and belief in the therapeutic powers of homeopathic treatments falls into this category. Thereby, the removal of funding for homeopathy funding would disproportionately affect, and therefore discriminate against, people who hold homeopathic philosophical beliefs. However, whether or not this amounts to a genuine philosophical belief is a moot point. It is a legitimate aim for the NHS to ensure that all of the medications or treatments it provides are efficacious and safe to use. The recommendation to end funding of homeopathy is a proportionate means of achieving that aim and is therefore permitted under the terms of the Equality Act.

For more details, information and evidence, contact Humanists UK:

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