
DECOMMISSIONING HOMEOPATHY CONSULTATION: BRISTOL, NORTH SOMERSET, AND SOUTH GLOUCESTERSHIRE CLINICAL COMMISSIONING GROUPS

Response from Humanists UK, August 2017

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). Earlier this year, 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.

OUR POSITION

We welcome the recommendations of Bristol, North Somerset, and South Gloucestershire CCGs to cease funding homeopathic treatments at the Portland Centre for Integrated Medicine, and end the practice of NHS doctors prescribing homeopathic remedies and referring patients to homeopaths.

RESPONSE TO THE CONSULTATION QUESTIONS

Do you understand the reasons for our proposal to stop NHS funding for homeopathy treatment?

Yes.

Do you agree or disagree with our proposal to cease NHS funding for homeopathy?

Agree.

Why do you say that?

Humanists UK has long campaigned against the state funding of homeopathy and other complementary and alternative medicines, as we believe that there is strong evidence that these treatments are not any more efficacious than placebos, and thereby fail to demonstrate that they have a positive benefit to health. Therefore funding of such treatments by the taxpayer cannot be justified.

In a report published in 2010, the House of Commons Science and Technology Select Committee laid out a clear framework for assessing the beneficial impact of homeopathy.¹ The report concluded that all considerations of the 'efficacy of homeopathy should be derived from well designed and rigorous randomised controlled trials (RCT).' The overwhelming result of RCTs into the efficacy of treatments has suggested that there is no health benefit from most such medications. For example in 2002, a review of RCTs into homeopathy concluded that 'collectively they failed to provide strong evidence in favour [of health benefits]' and no evidence of an effect greater than that of a placebo.² Without such evidence it is hard to see how such treatments can be said to be promoting health. In an environment of budget constraints, such as the NHS is currently experiencing, where funding for one treatment may mean that resources are not available another, funding for treatments that are known to be efficacious should take priority and would be the best interest of local patients.

Is there anything else you would like to say about our proposal not to offer homeopathy treatment in the NHS?

We recommend that Bristol, North Somerset and South Gloucester CCGs bring their policy on funding homeopathy in line with the recommendation of the Science and Technology Select Committee in 2010. Only a handful of CCGs have failed to implement this recommendation and continue fund homeopathic treatments. NHS Wirral and NHS Liverpool recently ceasing to support these remedies after the legality of their decision to continue funding was challenged.³

It is worth noting that NHS England is currently consulting on new guidelines for CCGs which recommend adding homeopathy to a list of items not to be prescribed in primary care: effectively ending homeopathic prescriptions on the NHS. Under these twin considerations -the legality of homeopathy funding being questionable and NHS England being minded to discontinue its funding already - it would be highly appropriate for Bristol, North Somerset and South Gloucester CCGs to bring forward their own plans to end funding as quickly as possible.

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 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

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 E Ernst, 'A systematic review of systematic reviews of homeopathy', British Journal of Clinical Pharmacology, 2002 Dec; 54 (6), p577-82: <https://www.ncbi.nlm.nih.gov/pubmed/12492603>

³ Good Thinking Society, 'NHS Homeopathic Spending': .

<http://goodthinkingsociety.org/projects/nhshomeopathy-legal-challenge/nhs-homeopathy-spending/>

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.

Please tell us whether you are:

Other: Voluntary Sector/Charity

Are you registered with a GP in:

I am not registered with a GP.

Age:

Prefer not to say as responding on behalf of an organisation.

Gender:

Prefer not to say as responding on behalf of an organisation.

Have you gone through a gender reassignment process or do you intend to:

Prefer not to say as responding on behalf of an organisation.

Do you consider yourself to be disabled?

Prefer not to say as responding on behalf of an organisation.

Ethnic origin:

Prefer not to say as responding on behalf of an organisation.

Sexual orientation:

Prefer not to say as responding on behalf of an organisation.

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

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