

## FSRH Response to Inform the Health and Social Care Committee’s Oral Evidence Sessions – NHS Inquiry into Legislative Proposals

The Faculty of Sexual and Reproductive Healthcare (FSRH) welcomes the opportunity to respond to the HSC Committee inquiry into the legislative proposals put forward by NHS England. FSRH is the largest UK multidisciplinary professional membership organisation representing the voices of more than 15,000 healthcare professionals working to deliver Sexual and Reproductive Healthcare (SRH). Our members work primarily for the benefit of women, ensuring contraceptive, cervical/ gynaecological, and pregnancy choices are met.

This response will therefore focus on the indication in the Long Term Plan (Para 2.4, Page 33) that:

*“the Government and the NHS will consider whether there is a stronger role for the NHS in commissioning sexual health services”*

FSRH would like to see holistic integrated commissioning of sexual and reproductive healthcare because of the negative impact of the current situation for women

### The current situation: The Health & Social Care Act and the need for better integration

FSRH believes there is a need for SRH care to be more broadly integrated into women’s healthcare pathways in the NHS. Holistic SRH care means integrating care around the needs of the individual, not institutional silos, with people able to get integrated/holistic advice and support across the breadth of SRH.

In particular, FSRH supports any move towards establishing a more collaborative, co-ordinated and joined-up health and care system. This is because since the 2012 Health & Social Care Act came into force, there has been inherent system fracture, which has meant that holistic care for many women has been effectively blocked. The below table demonstrates quite clearly why by-design the current system has inherent faults across SRH, whereby there is not a single body vested in ensuring the holistic needs of the women are being met<sup>1</sup>:

Clinical commissioning groups	NHS England	Local authorities
<ul style="list-style-type: none"> <li>• Termination of pregnancy services</li> <li>• Contraception for gynaecological purposes</li> <li>• Non-sexual health elements of psychosexual health services</li> <li>• Sterilisation</li> <li>• HIV testing when required in other CCG commissioned services</li> </ul>	<ul style="list-style-type: none"> <li>• Contraceptive services provided under the GP contract</li> <li>• HIV treatment and care</li> <li>• HIV testing when required in other NHS England commissioned services</li> <li>• STI testing and treatment provided under the GP contract</li> <li>• Cervical screening</li> <li>• HPV immunisation programme</li> </ul>	<ul style="list-style-type: none"> <li>• Contraception primarily delivered in community clinics</li> <li>• STI testing and treatment</li> <li>• Chlamydia screening</li> <li>• HIV testing, prevention, sexual health promotion and social care</li> <li>• Young people’s sexual health services</li> <li>• Services in schools</li> <li>• Sexual health aspects of psychosexual counselling</li> </ul>

<sup>1</sup> Public Health England, Making it work: A guide to whole system commissioning for sexual health, reproductive health and HIV, September 2014 (revised March 2015)

Although so many of the downstream benefits of preventing unplanned pregnancy are felt in the NHS (costs to maternity services, abortion pathways etc), it has been particularly difficult to engage Local Authorities to prioritise commissioning for benefits which are realised under NHS auspices, not least at a time where the public health budgets of Local Authorities are being severely cut. Conversely, there are nonsensical policy decisions being undertaken through the NHS, which demonstrate a lack of holistic planning, not least the example of contraception having no clear workstream pathway under the NHS's Maternity Transformation Programme.

This makes little economic sense – access to SRH care can be highly cost-saving. PHE has recently commended that for every £1 spent on publicly-funded contraceptive services, £9 is saved, most of which is realised in the NHS.<sup>2</sup>

As such, FSRH strongly recommends that any review of SRH commissioning responsibility should focus on women's health. Women's health has stood to suffer the most from the reorganisation of NHS services that ensued with the implementation of the Health & Social Care Act in 2013. Where once women could have all their reproductive health needs met in one place and one go, women are now subjected to disjointed, non-holistic, disintegrated care.

### Context of cuts

This narrative of disjointed care has been compounded by cuts to funding, notably cuts to SRH services which local authorities have been mandated to provide. In fact, there will have been a £700m real-terms reduction in the public health grant between 2014/15 and 2019/20<sup>3</sup>. Further, the Kings Fund estimates that between 2014/15 and 2018/19 there was an 18 per cent real-terms reduction in spending on sexual health services.

Cuts are set to deepen to a 25 per cent real-terms reduction in sexual health spend between 2014/15 and 2019/20.<sup>4</sup> Services providing sexual health advice, prevention and promotion have been among the biggest losers from the decrease in public health spending<sup>5</sup>. At the same time, the Local Government Association has reported that there is a record demand for sexual health services, a demand which has risen by 13 per cent since 2013. As a result, services are at tipping point, and a lack of capacity is leading to people being turned away.<sup>6</sup>

Where cuts are made to the public health-funded elements of SRH provision, the impact and increased cost is often felt in other parts of the system paid for by different commissioners. So LA-driven reductions in specialist SRH services increases the workload on GPs and other core contraceptive providers, while the consequent reduced access increases the need for CCG-funded maternity and abortion services. Around 41% of GPs in England responding to an RCGP survey from 2017 agreed that appointments for contraceptive advice have increased over the past year<sup>7</sup>.

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<sup>2</sup> PHE 2018. *Contraception: Economic Analysis Estimation of the Return on Investment (ROI) for publicly funded contraception in England*. [pdf] London: PHE: [https://www.gov.uk/government/publications/contraceptive-services-estimating-the-return-on-investment?utm\\_source=26490afe-f039-4007-ba27-6f9971c3ce5d&utm\\_medium=email&utm\\_campaign=govuk-notifications&utm\\_content=immediate](https://www.gov.uk/government/publications/contraceptive-services-estimating-the-return-on-investment?utm_source=26490afe-f039-4007-ba27-6f9971c3ce5d&utm_medium=email&utm_campaign=govuk-notifications&utm_content=immediate)

<sup>3</sup> Buck, D. 2018. Prevention is better than cure – except when it comes to paying for it <https://www.kingsfund.org.uk/blog/2018/11/prevention-better-cure-except-when-it-comes-paying-it>

<sup>4</sup> Written parliamentary evidence by the King's Fund. <http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/health-and-social-care-committee/sexual-health/written/91508.html>

<sup>5</sup> King's Fund 92018) Sexual health services and the Importance of prevention <https://www.kingsfund.org.uk/blog/2018/12/sexual-health-services-and-importance-prevention>

<sup>6</sup> LGA, 2017. Sexual health services at tipping point warn councils. *Local Government Association*. [online]. Available at: <https://www.local.gov.uk/about/news/sexual-health-services-tipping-point-warn-councils>

<sup>7</sup> Time to Act <https://www.rcgp.org.uk/policy/rcgp-policy-areas/maternity-care.aspx>

The apportioning of SRH commissioning responsibilities between CCGs, LAs and NHSE also disrupts patient pathways in SRH because services are shaped by the source, availability and amount of funding rather than by patient need<sup>8</sup>. In addition to finding that LAs cannot maintain the current levels of service provision due to cuts, the review of commissioning by PHE and ADPH has also confirmed the experience of FSRH members that fragmented commissioning of services is threatening access to contraception and other sexual health services<sup>9</sup>. PHE and ADPH specifically indicate that “LARC and cervical cytology might suffer”<sup>10</sup>.

### Impacts on access to women’s health

- **Contraception:** at the same time as funding for contraception is being cut, prescriptions for Long Acting Reversible Contraception (LARC) is declining. PHE data shows that the number of prescriptions for LARC has reduced by 8% across England between 2014 and 2016. More than a quarter (27%) of GPs in England responding to a RCGP survey disagreed that patients who need LARC are always able to access it. Out of 86% of GPs in England who provide LARC in their practice, 39% said they have experienced cuts to the funding for this service<sup>11</sup>. This is despite the Government and NICE recommending increasing uptake of LARC methods.
- **Cervical screening:** despite being provided by some SRH services, cervical screening is not a mandated requirement for LA commissioning and is not included in most SRH service specifications. Cuts to services, fragmentation of commissioning and the absence of a national budget line for cervical screening have had a knock-on effect on the capacity of primary care, where most screening is provided, to deliver this life-saving test. Cervical screening rates have dropped for the fourth year in a row and are now at their lowest in two decades. Coverage for women aged 25 to 64 is now at 71.4%, significantly below the 80% national target. Even lower are rates in the younger age bracket (25-49), when there is higher risk for cervical abnormalities, with coverage at only 69.1%<sup>12</sup>. FSRH members have been consistently reporting that women are being turned away from SRH services, too stretched to manage to deliver what is currently in their service specifications, which often do not include cervical screening.
- **Contraception for gynaecological purposes:** many women choose to see their GPs when they have a gynaecological issue, but 39% of GPs in England surveyed by RCGP have reported experiencing cuts to the funding for LARC<sup>13</sup>. Women used to be treated cheaply and effectively in the community and are now being sent to gynaecologists in hospitals despite the much higher cost of this and inconvenience to the patient.

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<sup>8</sup> Time to Act <https://www.rcgp.org.uk/policy/rcgp-policy-areas/maternity-care.aspx>

<sup>9</sup> PHE, 2017. *Sexual Health, Reproductive Health and HIV. A Review of Commissioning*. [pdf] London: PHE. Available at: <https://www.gov.uk/government/publications/sexual-health-reproductive-health-and-hiv-commissioning-review>

<sup>10</sup> PHE, 2017. *Sexual Health, Reproductive Health and HIV. A Review of Commissioning*. [pdf] London: PHE. Available at: <https://www.gov.uk/government/publications/sexual-health-reproductive-health-and-hiv-commissioning-review>

<sup>11</sup> Time to Act

<sup>12</sup> NHS Digital: <https://digital.nhs.uk/data-and-information/publications/statistical/cervical-screening-programme/england---2017-18>

<sup>13</sup> RCGP, 2017. *Sexual and Reproductive Health Time to Act*. [pdf] London: RCGP. Available at: <http://www.rcgp.org.uk/policy/rcgp-policy-areas/maternity-care.aspx>

- **Abortion:** abortion rates to women over 30 have been increasing over the last 10 years<sup>14</sup>. Whilst there is no evidence of direct causation, FSRH is concerned that the increase in terminations of pregnancies for those aged 30 and over may indicate an unmet need for contraception. Additionally, CCGs commission abortion services, while LAs commission contraceptive care. This creates a break in the care pathway which means that the patients who access abortion services are not automatically referred to contraceptive advice and treatment through the same care pathway, leaving them at risk of further unintended pregnancy<sup>15</sup>.

## Conclusion

The outcomes described above are not coherent with a focus on prevention championed by the Secretary of State and with a NHS service that aims to provide integrated care as envisioned in the NHS Long Term Plan.

Above all, women, who make up half of the population, are being failed by a fragmented system. The UK's population behaviour continues to change, with a widening of the gap between when people start having sex and the age when they have their first child<sup>16</sup>. Women are, therefore, spending a longer time preventing unplanned pregnancies and a lifetime of managing their reproductive and post-reproductive health. The current system, which inherently fosters silo'd commissioning across sexual and reproductive healthcare does little to support this reality.

**FSRH called for NHS commissioning of SRH services last year:** in 2018 the Department for Health and Social Care (DHSC) launched a review of the impacts of local authority (LA) mandated public health functions. [In our response](#), we asked DHSC to consider bringing SRH back into the NHS: *"SRH services are quite unique in that, unlike other public health services, they are clinical services just like other NHS services, and therefore warrant further consideration as to whether the NHS is best placed to have this responsibility"*. The outcome of this review has not been published yet.

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<sup>14</sup> Abortions among the 30-34 age group increased from 15.1 per 1,000 women in 2007 to 18.2 in 2017, while rates for women aged 35 and over increased from 6.9 per 1,000 women in 2007 to 8.5 per 1,000 women in 2017 resident in England and Wales. DHSC 2018. *Abortion Statistics, England and Wales: 2017. Summary information from the abortion notification forms returned to the Chief Medical Officers of England and Wales.* [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/763174/2017-abortion-statistics-for-england-and-wales-revised.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/763174/2017-abortion-statistics-for-england-and-wales-revised.pdf)

<sup>15</sup> Time to Act <https://www.rcgp.org.uk/policy/rcgp-policy-areas/maternity-care.aspx>

<sup>16</sup> National Survey of Sexual Attitudes and Lifestyles – 3 (2013) Available at: <http://www.natsal.ac.uk/natsal-3.aspx>