



Dr Bruce Warner
Deputy Chief Pharmaceutical Officer, NHS England
Dr Graham Jackson
Co-Chair, NHS Clinical Commissioners

20th April 2018

Dear Drs Warner and Jackson

Conditions for which over the counter items should not routinely be prescribed in primary care: Guidance for CCGs – section 4.3.1 Mild Irritant Dermatitis

Thank you for sharing the final recommendations of the recent NHS England Over-the-counter (OTC) document. The majority of our concerns have been addressed and the final guidance generally succeeds in meeting the difficult balance between restricting treatments that are affordable OTC for most of the population, whilst providing protection for those with more severe or long standing disease and those with specific vulnerability.

However, we continue to have significant concerns regarding the section '4.3.1 Mild Irritant Dermatitis'. There appears to be a fundamental misunderstanding of the difference between two completely different diseases; "irritant contact dermatitis" due to irritants and "allergic contact dermatitis" due to allergens. We did make this point in the consultation as did other responders, including patient, primary care and nursing groups. Of note "Contact dermatitis" includes the diagnoses of both irritant and allergic contact dermatitis and therefore should not be used to refer to mild irritant dermatitis as it causes further confusion. The wording in the text relates to mild irritant dermatitis for which the advice is correct and we would recommend altering the wording of this section as below.

The distinction is important. An irritant and an allergen are not the same thing. An allergen works by triggering an allergic response, whereas an irritant has a direct chemical or physical effect. Allergic contact dermatitis requires investigation and treatment to identify the allergen so that it can then be avoided. This is a disease of young working-age people and is an important cause of absence from work.

We feel very strongly that this section should be reworded as currently it is inaccurate and will cause confusion. We would be happy to meet and discuss further.

Thank you.

Yours Sincerely,

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Dr Tanya Bleiker
Clinical Vice President BAD

Handwritten signature of Nick Levell in cursive script.

Dr Nick Levell
President BAD

**Conditions for which over the counter items should not routinely be prescribed in primary care:
Guidance for CCGs**

4.3.1 Mild Irritant Dermatitis

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Annual Spend	c. £14,500,000
Rationale for recommendation	<p>Irritant dermatitis is a type of eczema triggered by contact with a particular substance. Once treated most people can expect their symptoms to improve and/or clear up completely if the irritant or allergen can be identified and removed or avoided</p> <p>It is most commonly caused by irritants such as soaps, washing powders, detergents, solvents or regular contact with water. Treatment normally involves avoiding the allergen or irritant and treating symptoms with over the counter emollients and topical corticosteroids.</p>
References:	<ol style="list-style-type: none"> 1. NHS Choices: Contact Dermatitis accessed October 2017 2. NICE CKS: Dermatitis - contact accessed October 2017
Recommendation	Advise CCGs that a prescription for treatment of contact mild irritant dermatitis should not routinely be offered in primary care as the condition is appropriate for self-care.
Exceptions	No routine exceptions have been identified. See earlier for general exceptions.

Appendix 2 – Example products for conditions or over the counter items that could be restricted.

Contact Dermatitis	
Mild Irritant Dermatitis	Emollients, Steroid creams.