

<b>Meeting: Governing Body- meeting in public</b>			
<b>Meeting Date</b>	27 March 2019	<b>Action</b>	Approve
<b>Item No.</b>	10	<b>Confidential</b>	No
<b>Title</b>	Gluten Free Prescribing		
<b>Presented By</b>	Howard Hughes Clinical Director		
<b>Author</b>	Jeanette Tilstone Head of Medicines Optimisation		
<b>Clinical Lead</b>	Nigget Saleem, Clinical Lead		

<b>Executive Summary</b>
<p>This paper provides the Governing Body with an update on a previous decision to withdraw NHS prescriptions for gluten free (GF) products from adults (aged 19 years and over) with Coeliac Disease / Dermatitis Herpetiformis (which commenced on 1st January 2017).</p> <p>It requests a decision on future local policy in the light of a new national decision by the Department of Health and Social Care (DHSC) to restrict the prescribing of some gluten-free foods on the NHS from 4th December 2018.</p>
<b>Recommendations</b>
<p>It is recommended that the Governing Body:</p> <ul style="list-style-type: none"> <li>Approves the Clinical Cabinet's recommendation to align Bury's existing Gluten Free prescribing policy to reflect the new national guidance relating to the restriction in GF products available on prescription.</li> </ul>

<b>Links to CCG Strategic Objectives</b>	
To encourage people so that they want to, and do, take responsibility for their own health and well-being.	<input checked="" type="checkbox"/>
To drive and support system wide transformation.	<input type="checkbox"/>
To commission joined-up health and social care for people in Bury through a Single Commissioning Framework.	<input type="checkbox"/>
To achieve financial sustainability for the Bury health and social care economy.	<input checked="" type="checkbox"/>
To support the Locality Care Alliance to deliver high quality services in line with commissioner intentions.	<input type="checkbox"/>
To be a high-performing, well-run and respected organisation with an empowered workforce	<input type="checkbox"/>
Does this report seek to address any of the risks included on the Governing Body Assurance Framework? If yes, state which risk below:	
GBAF <i>n/a</i>	

Implications						
Are there any quality, safeguarding or patient experience implications?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>
<i>The restriction on prescribing of GF products (under 19s only) is already in place</i>						
Has any engagement (clinical, stakeholder or public/patient) been undertaken in relation to this report?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
<i>Previously undertaken during 2016</i>						
Have any departments/organisations who will be affected been consulted ?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>
<i>Clinical leads (Clinical director, &amp; Clinical Lead for Medicines Optimisation and Learning Disabilities)</i>						
Are there any conflicts of interest arising from the proposal or decision being requested?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	N/A	<input checked="" type="checkbox"/>
Are there any financial Implications?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>
Small prescribing saving as highlighted in briefing						
Has a Equality, Privacy or Quality Impact Assessment been completed?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	N/A	<input checked="" type="checkbox"/>
Is a Equality, Privacy or Quality Impact Assessment required?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	N/A	<input checked="" type="checkbox"/>
Governing Body is not being asked to vary the current policy. The Department of Health and Social Care undertook an EIA on the restriction in product choice and this is available here: <a href="https://www.england.nhs.uk/wp-content/uploads/2018/11/prescribing-gluten-free-foods-equalities-health-inequalities.pdf">https://www.england.nhs.uk/wp-content/uploads/2018/11/prescribing-gluten-free-foods-equalities-health-inequalities.pdf</a>						
Are there any associated risks including Conflicts of Interest?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>
Are the risks on the CCG's risk register?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	N/A	<input checked="" type="checkbox"/>
Potentially, if the Governing Body decision is to vary the current policy.						

Governance and Reporting				
Meeting	Date	Outcome		
Clinical Cabinet	06/02/2019	<b>ID</b>	<b>Type</b>	<b>The Clinical Cabinet:</b>
				Considered the impact of the new national restriction and its impact upon local prescribing policy.
		<b>DC/05/06/02/19</b>	<b>Decision</b>	Supported Option 1 which allows continuation of gluten-free items on prescription (albeit within the new DHSC restricted list) for children and adults under 19 years only.

		DC/06/06/02/19	Decision	Agreed the recommendation to the Governing Body to continue the existing policy for Bury in light of recent national guidance.
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# Gluten-Free prescribing in Bury

## 1. Introduction and background

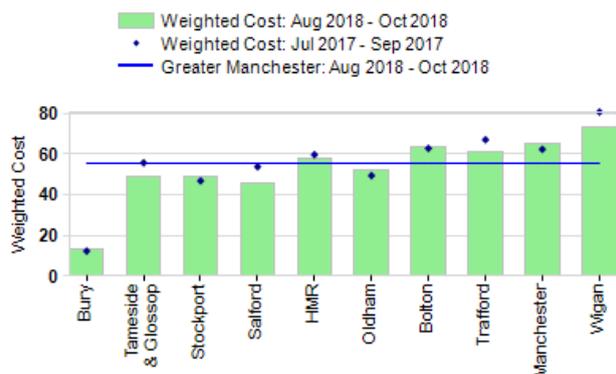
- 1.1. In September 2016, following a period of public engagement, the CCG's Governing Body agreed to withdraw NHS prescriptions for gluten free (GF) products from adults (aged 19 years and over) with Coeliac Disease / Dermatitis Herpetiformis registered with a Bury GP practice. This change in local policy commenced on 1st January 2017.
- 1.2. It should be noted that alongside the withdrawal of prescribing GF products for adults, an enhanced programme of support for patients with Coeliac Disease was introduced, in conjunction with Bury GP practices and the Community Nutrition and Dietetic service. This comprised provision of self-management plans and awareness sessions, and maintenance of GP practice registers to support patient identification and follow up.
- 1.3. In November 2018 following a national consultation, the Department of Health and Social Care (SHSC) announced its decision to restrict the prescribing of some gluten-free foods on the NHS. Only gluten-free bread and/or gluten-free flour mixes will be allowed on prescription at NHS expense in the future. This change in legislation commenced on 4<sup>th</sup> December 2018.
- 1.4. The rationale for the DHSC decision was that in recent years the variety and accessibility of gluten-free products in supermarkets has improved dramatically. Whilst the vast majority of foods are naturally gluten-free, there was recognition that some specialist gluten-free products cost more than the equivalent gluten containing items. In order to minimise the financial pressures rather than stop prescribing altogether, it was decided to limit prescribing of gluten-free foods to staples that are more expensive to buy as a gluten free product in the supermarkets, i.e. bread and flour mixes. The addition of flour mixes (including multipurpose flour and bread mixes) allows people to cook or bake other foods.

## 2. Current position of prescribing of GF products in Bury

- 2.1. Since the introduction of a local restriction in January 2017, only children and adults under the age of 19 years receive any gluten-free products on prescription.
- 2.2. For children and adults under the age of 19 years eligible to receive prescriptions, there are further restrictions on the type and quantity of GF products allowed:
  - 2.2.1. **Type:** only staple foods such as bread, pasta, flours, crackers and cereals.
  - 2.2.2. Current prescribing **allowances:**

Age Group	Number of Units /month
Child 1 – 3 years	8
Child 4 – 6 years	9
Child 7 – 10 years	10
Child 11 – 14 years	12
Child 15 – 18 years	14

- 2.3. As a result of these restrictions, Bury has the lowest weighted prescribing costs of these products in Greater Manchester:



Items have decreased from an average of 425 per month to 93 per month, and average costs from £5,828 to £1,203 per month.

- 2.4. 60% of GF items currently issued on prescription are for breads and bread mixes that will continue to be allowed under the new legislation.

### 3. Quality impact of the January 2017 restrictions

- 3.1 There were two formal complaints received during 2016/17 relating to the withdrawal of GF prescriptions for adults, in addition to one MP enquiry and one patient enquiry, both to ascertain whether Bury CCG will reinstate prescribing of gluten-free items for adults as a result of the DHSC decision. There have been no recorded incidents relating to the change.
- 3.2 Feedback from the awareness sessions run by the Community Nutrition and Dietetics service has been positive and further sessions are planned for 2019. New patients and those patients who have opted for an individual consultation/annual review with the dietitian continue to receive 1:1 reviews.

### 4. Recommendation from Bury CCG Clinical Cabinet in February 2019

- 4.1 In February 2019 the Clinical Cabinet received a paper which:
- 4.1.1 Updated members on the original decision to withdraw NHS prescriptions for Gluten Free products from adults (aged 19 and over) with Coeliac Disease/Dermatitis Herpetiformis, and;
  - 4.1.2 Requested a consideration of future local policy in light of the new national decision by the Department of Health and Social Care (DHSC) to restrict the prescribing of some gluten-free foods on the NHS from 4th December 2018.

There were 3 options for consideration:

- Option 1: No change. Children and adults under 19 years would continue to receive prescriptions for GF bread and flour mix products, up to the defined monthly limits. This may result in financial savings of around £3,000 per annum, although patients previously receiving items that are now disallowed (e.g. pasta, cereals) may switch to bread and/or mixes. The recommendation in the paper was that Clinical Cabinet support this option.

- Option 2: Reintroduce GF items on prescription for adults, subject to defined monthly limits. This would result in an increased spend.
- Option 3: Withdraw prescriptions for GF items for all Bury patients. This would result in a recurrent annual saving of around £14,400. (In its guidance to CCGs on Prescribing Gluten-Free Foods in Primary Care<sup>1</sup>, NHS England states that whilst the Amendment Regulations aimed to reduce variation as they allow only for GF bread and mixes to be prescribed at NHS expense, 'CCGs may further restrict the prescribing of GF foods by selecting bread only, mixes only or CCGs may choose to end prescribing of GF foods altogether'.)

4.2 Following a comprehensive clinical discussion the Clinical Cabinet supported Option 1 which allows continuation of gluten-free items on prescription (albeit within the new DHSC restricted list) for children and adults under 19 years only.

## 5 Recommendations

Governing Body is required to note the current prescribing arrangements for gluten-free products in Bury; consider the impact of the new national restriction and its impact upon local prescribing policy, and approve the recommendation of Bury CCG's Clinical Cabinet which recommends the continuation of gluten-free items on prescription (albeit within the new DHSC restricted list) for children and adults under 19 years only.

## 6 Actions Required

The Governing Body is requested to approve the Clinical Cabinet's recommendation to align Bury's existing Gluten Free prescribing policy to reflect the new national guidance relating to the restriction in GF products available on prescription.

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March 2019

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<sup>1</sup> <https://www.england.nhs.uk/wp-content/uploads/2018/11/prescribing-gluten-free-foods-primary-care-guidance-for-ccgs.pdf>