

Report to Joint Health Overview and Scrutiny Committee for South Yorkshire, Derbyshire Nottinghamshire and Wakefield 7th November, 2019

Report of: Proposed Pre-Consultation to Consider Formal Consultation regarding Standardisation of Prescribing of Gluten Free Products across South Yorkshire and Bassetlaw

Subject: Pre-Consultation on Gluten Free Prescribing

Author of Report: Idris Griffiths, Chief Officer Bassetlaw CCG and South Yorkshire and Bassetlaw lead for medicines management

Summary:

Information relating to Gluten Free Prescribing, including the differences between CCGs in terms of prescribing guidelines and cost differences, were presented to the South Yorkshire and Bassetlaw Joint Committee of Clinical Commissioning Groups (JCCCG) for consideration of whether all 5 CCGs should adopt the same prescribing recommendations.

To get an initial public viewpoint on this the South Yorkshire and Bassetlaw Citizens Panel members were asked for their thoughts. They felt that all 5 CCGs should adopt the same prescribing recommendations, i.e. that there should be equity of access across the CCGs. The Panel felt that the consideration should be one of equity rather than cost saving.

The JCCCG has subsequently instructed that wider engagement take place. This paper sets out the relevant issues relating to gluten free prescribing and seeks the views of the Joint Scrutiny Committee regarding the proposed engagement/ pre-consultation exercise.

Type of item: The report author should tick the appropriate box

| | |
|---|------------|
| Reviewing of existing policy | Yes |
| Informing the development of new policy | |
| Statutory consultation | Yes |
| Performance / budget monitoring report | |
| Cabinet request for scrutiny | |
| Full Council request for scrutiny | |
| Call-in of Cabinet decision | |
| Briefing paper for the Scrutiny Committee | |
| Other | |

The Scrutiny Committee is being asked to:

Discuss the proposals for an engagement/ pre-consultation exercise to establish public and stakeholder views on a potential standardisation of the NHS policy on prescribing gluten free products across South Yorkshire and Bassetlaw and provide the ICS with any views and comments.

To provide their views on whether any changes to the prescribing of gluten free bread and mixes in South Yorkshire and Bassetlaw would be considered a substantial development or variation, and accordingly if they recommend that there is a formal duty to consult with the Local Authority under the s244 regulations, once the current engagement/ pre-consultation exercise has taken place.

Category of Report: OPEN

Report of the South Yorkshire and Bassetlaw Chief Officer Lead for Medicines Management

1. Introduction/Context

- 1.1 Information relating to Gluten Free Prescribing, including the differences between CCGs in terms of prescribing guidelines and cost differences were presented to the South Yorkshire and Bassetlaw Joint Committee of Clinical Commissioning Groups (JCCCG) for consideration of whether all 5 CCGs should adopt the same prescribing recommendations..
- 1.2 To get an initial public viewpoint on this the South Yorkshire and Bassetlaw Citizens Panel members were asked for their thoughts. They felt that all 5 CCGs should adopt the same prescribing recommendations, i.e. that there should be equity of access across the CCGs. The Panel felt that the consideration should be one of equity rather than cost saving.
- 1.3 The JCCCG has subsequently instructed that wider engagement take place prior to any formal public consultation.
- 1.4 This paper sets out the relevant issues relating to gluten free prescribing and seeks the views of the Joint Scrutiny Committee regarding the proposed engagement/ pre-consultation exercise.

2. Background

- 2.1 Coeliac disease is a lifelong autoimmune disease caused by a reaction to gluten. When someone has coeliac disease their small intestine becomes inflamed if they eat food containing gluten. This reaction to gluten makes it difficult for them to digest food and nutrients. Symptoms include diarrhoea, constipation, vomiting, stomach cramps, mouth ulcers, fatigue and anaemia.
- 2.2 Once diagnosed, coeliac disease is treated by following a gluten free diet for life. A gluten free diet can be achieved without the need for specific manufactured products as many food items are naturally gluten free, e.g. meat, fish, fruit and vegetables, rice & potatoes.
- 2.3 Gluten Free (GF) foods are available on prescription to patients diagnosed with gluten sensitivity enteropathies, and have been since the late 1960s when the availability of GF foods was very limited. GF foods are now readily available in most supermarkets and a wider range of naturally GF food types are also available, so the ability of patients to obtain these foods without a prescription has greatly increased.
- 2.4 In March 2017, the Department of Health launched a consultation on the availability of Gluten Free Foods on Prescription. The outcome of the

consultation was reported in January 2018 and the overall statement was as follows:

“Following its consultation on the availability of gluten-free foods on NHS prescription, the government has decided to restrict gluten-free prescribing to bread and mixes only. The majority of consultation responses were in favour of this.”

<https://www.gov.uk/government/consultations/availability-of-gluten-free-foods-on-nhs-prescription>

- 2.5 In August 2018 the Department of Health published a consultation on the changes to be made to the drug tariff for Gluten Free Items. The consultation closed on 1st October 2018; then, following amendments to the Prescribing Regulations, the Drug Tariff was amended in December 2018. NHS prescriptions issued in England from December 2018 can only be for specific GF bread or GF mixes as listed in the Drug Tariff.
- 2.6 Whilst GPs can only now prescribe GF bread and Mixes CCGs can adopt local policies that may go further than the changes implemented in December 2018. There are differences across South Yorkshire and Bassetlaw between the CCGs in the prescribing of Gluten Free Products to coeliac patients.

3.0 Current Policies

- 3.1 Prescribing of gluten free foods to adults (over the age of 18) is not recommended in Sheffield. Prescribers can however apply discretion in exceptional circumstances where they are sufficiently convinced that there is a genuine risk that a vulnerable individual is, or will become, undernourished if they do not prescribe gluten free products.
- 3.2 Barnsley CCG has restricted prescribing of bread and mixes to a volume of 8 units per month per individual.
- 3.3 Bassetlaw and Doncaster CCGs have similar recommendations to clinicians regarding prescribing of gluten free products and prescribe bread and mixes to the Coeliac Society recommendations.
- 3.4 Rotherham is slightly different to Bassetlaw and Doncaster in that the quantity recommended to prescribe is 2 units less than the Coeliac Society recommendations.
- 3.5 Across South Yorkshire and Bassetlaw in 2018/19 over £400,000 was spent on prescribing gluten free food.
- 3.6 Standardising policies on gluten free products would have significantly different financial impacts depending on the approach taken with a potential range of an investment of £200,000 to a saving of up to £290,000

4.0 What does this mean for the people of South Yorkshire and Bassetlaw?

- 4.1 At this stage the proposal is to carry out a pre-consultation exercise to consider the detail and options for a potential formal consultation. There will therefore be no impact on the population at this time.
- 4.2 There are approximately 1,400 adults who request prescriptions for gluten free bread and mixes in South Yorkshire and Bassetlaw. This is approximately 0.11% of the population – a figure which has reduced significantly in recent years, very largely due to the wide availability of gluten free products in shops.
- 4.3 Approximately 1% of the population have coeliac disease so approximately 90% of those suffering the disease do not use prescriptions. Where prescriptions are used the volumes requested by individual patients also vary from infrequent to regular.
- 4.4 Any change in policy is therefore likely to have no, or very little, impact on 99.9% of the population. However, the impact on some of the 0.1%, particularly those living in poverty, could be significant depending on the outcome of any engagement and if any future policy recommended further removal of access to gluten free prescriptions.
- 4.5 It is proposed that the pre-consultation is a targeted exercise using focus groups to ensure a cross-section of views are captured. Those who could be affected by any potential changes will be targeted as will those for whom the current prescribing recommendations could be deemed inequitable.

5.0 Recommendation

- 5.1 The Committee is asked to discuss and provide the ICS with any views and comments on the proposals for a pre-consultation to establish public and stakeholder views on a potential formal public consultation to standardise the NHS policy on prescribing gluten free products across South Yorkshire and Bassetlaw.
- 5.2 The Committee is asked for their views on whether any changes to the prescribing of gluten free bread and mixes in South Yorkshire and Bassetlaw would be considered a substantial development or variation, and accordingly if they would recommend that that there is a formal duty to consult with the Local Authority under the s244 regulations, once the current pre-consultation exercise has taken place.

This page is intentionally left blank