

Gluten-Free Foods Prescribing Policy

Version:	V.2
Ratified by:	CCG Governing Body Meetings in Common
Date ratified:	30 th July 2020
Name of originator/author:	North Staffordshire and Stoke on Trent Clinical Commissioning Groups Amin Mitha
Name of responsible committee/individual:	Samantha Buckingham, Head of Medicines Commissioning – South Staffordshire
Date approved by Committee/individual	31 st July 2020
Date issued:	1 st August 2020
Review date:	31 st July 2023
Date of first issue	December 2016
Target audience:	GPs, Medicines Optimisation Teams, Public

CONSULTATION SCHEDULE

Name and Title of Individual	Groups consulted	Date Consulted
North Staffordshire and Stoke on Trent Clinical Commissioning Groups	Public engagement	2 nd September 2016 to 30 th September 2016
Cannock Chase, East Staffordshire, South East Staffordshire and Seisdon Peninsula and Stafford and Surrounds Clinical Commissioning Groups	Public engagement	6 th January 2020 to 9 th February 2020

RATIFICATION SCHEDULE

Name of Committee approving Policy	Date
North Staffordshire CCG and Stoke-on-Trent CCG Joint Governing Board	December 2016
Cannock Chase CCG Membership Board	8 th July 2020
East Staffordshire CCG Steering Group	7 th July 2020
Seisdon Peninsula Locality Board	8 th July 2020
Stafford and Surrounds CCG Membership Board	7 th July 2020
Tamworth, Lichfield & Burntwood Joint Locality Board	14 th July 2020

VERSION CONTROL

Version	Version/Description of amendments	Date	Author/amended by
1	North Staffs & Stoke on Trent	2016	
2	Policy amended to cover all Staffordshire and Stoke on Trent Clinical commissioning groups. Policy to also reflect national changes since 2016. Reduce availability to bread and mixes on NHS prescription for children and adolescents under 18.	2020	Samantha Buckingham/ Mary Johnson

Impact Assessments – available on request

	Stage	Complete	Comments

Equality Impact Assessment	1 & 2	November 2016 May 2019	<i>North Staffs & Stoke on Trent</i> <i>South Staffordshire</i>
Quality Impact Assessment		December 2016 April 2019	<i>North Staffs & Stoke on Trent</i> <i>South Staffordshire</i>

**Staffordshire and Stoke on Trent Clinical Commissioning Groups
(Gluten-Free Foods Prescribing)**

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Policy Statement:

The Staffordshire & Stoke on Trent Clinical Commissioning Groups (Cannock Chase, East Staffordshire, North Staffordshire, South East Staffordshire and Seisdon Peninsula, Stafford and Surrounds and Stoke-on-Trent Clinical Commissioning Groups (CCGs) only support NHS prescriptions for gluten free foods to children and adolescents under the age of 18 years and diagnosed with Coeliac Disease, other gluten related enteropathy or dermatitis herpetiformis.

The range of foods available on NHS prescription will be restricted to bread and mixes for those children and adolescents under 18.

1 Introduction

- 1.1 Coeliac Disease (CD) is an autoimmune disease that involves a reaction to gluten which is found in wheat, rye and barley. If patients continue to consume gluten containing foods then they can develop serious complications such as osteoporosis, anaemia and intestinal malignancy. Patients with CD can lead a healthy life if they completely exclude gluten from their diet.
- 1.2 Gluten free (GF) foods are not a cure for coeliac disease, nor does it treat the symptoms. Medical advice given to patients who are gluten intolerant would be to avoid food products containing gluten. People who have gluten sensitivity can consume other foods that do not contain gluten and yet are a good source of carbohydrates - foods such as rice, potatoes, fruits and vegetables are healthy, gluten-free options.
- 1.3 Staple GF foods have been available on prescription to patients diagnosed with gluten sensitivity enteropathies since the late 1960s when the availability of GF foods was limited. Gluten-free foods are now readily available in supermarkets and a wider range of naturally GF food types are available, meaning that the ability of patients to obtain these foods without a prescription has greatly increased.
- 1.4 It is acknowledged that in some supermarkets the GF food range can be more expensive than the gluten containing equivalents. However, the price paid by the NHS is much higher than the prices of similar products found in supermarkets. In some cases, the NHS has to pay four times more than a customer would to purchase an equivalent GF product.
- 1.5 In 2018 the Department of Health and Social Care (DHSC) commenced a consultation "*The Availability of Gluten Free Foods on Prescription in Primary Care*". In November 2018, NHS England published guidance to primary care and the Government restricted prescriptions to gluten-free foods to bread and mixes only.¹
- 1.6 North Staffordshire CCG and Stoke-on-Trent CCG implemented a policy for GF food prescribing to children and adolescents under the age of 18 diagnosed with coeliac disease, other gluten-related enteropathy or dermatitis herpetiformis in December 2016.
- 1.7 It may be considered inequitable that one section of the community is able to access significant amounts of food on the NHS whilst other members of the public who also have other special dietary requirements do not benefit from the same level of access such as diabetics.

2. Aims and objectives

- 2.1 Based on above factors and taking into account the current financial situation and the current inequality of the provision across Staffordshire and Stoke on Trent the CCGs can no longer justify the level of funding that is required for provision of GF foods. However, it is acknowledged that children with CD would be relying on parents for access to GF foods and there is a risk that children with CD would suffer if their diet was not modified adequately with provision of GF staple foods.
- 2.2 Therefore Staffordshire & Stoke on Trent Clinical Commissioning Groups (CCGs) will only support NHS prescriptions for gluten free foods to children and adolescents under the age of 18 years and diagnosed with Coeliac Disease, other gluten related enteropathy or dermatitis herpetiformis. The range of foods available on NHS prescription will be restricted to bread and mixes.

3. Scope

- 3.1 Staffordshire & Stoke on Trent Clinical Commissioning Groups (CCGs) will only support NHS prescriptions in Primary care for children and adolescents under the age of 18 years and diagnosed with Coeliac Disease, other gluten related enteropathy or dermatitis herpetiformis. The range of foods available on NHS prescription will be restricted to bread and mixes for those children and adolescents that are under 18.
- 3.2 This will apply to all registered patients within the Staffordshire & Stoke on Trent Clinical Commissioning Groups.

4. Review date

- 4.1 This policy will be review three years from the approval date.

5. Policy development

- 5.1 This is policy has been developed from the North Staffordshire and Stoke on Trent CCGs Policy statement on GF prescribing (December 2016). This was approved by the Governing Body following a public engagement process from 2nd September 2016 to 30th September 2016.

- 5.2 A public engagement process was undertaken in South Staffordshire from 6th January 2020 to 9th February 2020. The outcomes from this engagement were reviewed and considered as part of the formation of this policy. The majority of the concerns expressed were around cost and low income groups and are addressed in the Equality Statement (6.1) and the vulnerable groups section (6.2) of this policy.

6. Equality Statement

- 6.1 In applying this policy, the Organisation will have due regard for the need to eliminate unlawful discrimination, promote equality of opportunity, and provide for good relations between people of diverse groups, in particular on the grounds of the following characteristics protected by the Equality Act (2010); age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, and sexual orientation, in addition to offending background, trade union membership, or any other personal characteristic.
- 6.2 It is inequitable that NHS provides food for patients with CD and yet other patients requiring dietary adjustments are required to have responsibility for managing their diet appropriately without any special dietary provision from the NHS when these foods are widely available to purchase. For example patients with diabetes also have to take personal responsibility for modifying their diet and carbohydrate consumption in order to successfully manage their condition. Diabetic patients receive no foods on prescription.
- 6.3 Where specialist foods are not widely available to purchase the CCGs will continue to support prescribing on the NHS within recommended quantities. This would include the prescribing of foods for other conditions e.g. phenylketonuria where low-protein foods are not widely available for purchase.
- 6.4 Comments from the Local Equalities Advisory Forum referred to the financial impact of the proposed changes on deprived families. There were also concerns about access to GF foods for those with mobility issues and living in rural locations. The Coeliac Society advised that CCGs should give due consideration to people who have barriers to reading and understanding food labels. The view that has emerged through various discussions is that patients with CD who have literacy issues or learning disabilities are no different to other patients, for example diabetic patients, who will share exactly the same challenge when making purchasing decisions. All patients who have to modify their diet continue to get appropriate advice through their GP and the local dietetic service. There are also social care arrangements in place that support such vulnerable patients to make decisions about their health and wellbeing.

6.5 NICE Quality Standard on diagnosis and management of Coeliac Disease (published October 2016)². The NICE quality statement with regard to diet places emphasis on availability of specialist dietary advice. None of the statements require NHS commissioners to make arrangements for provision of GF foods. Under “Equality and Diversity Considerations” NICE *advises* healthcare professionals on how they could support patients with limited mobility or on low incomes by prescribing GF foods. CCGs’ views as stated above address limited mobility. With regards to low income the view is that CCGs cannot commission services on the basis of means testing but should be on the basis of clinical need and health outcomes. In a similar scenario the current NHS guidance on self-care clearly states that, a patient being exempt from paying a prescription charge does not automatically warrant an exception to the guidance.

7. Implementation

- 7.1 This policy will be implemented in primary care across the Staffordshire and Stoke on Trent Clinical Commissioning Groups. It will be available to clinicians and the public from the date approved.
- 7.2 This Policy was implemented in North Staffordshire and Stoke on Trent Clinical Commissioning Groups in December 2016.
- 7.3 From 1st August 2020 existing patients and prescribing in South Staffordshire CCGs will be reviewed to implement this Policy.

8. References

- 1. Prescribing Gluten-Free Foods in Primary Care: Guidance for CCGs NHS England November 2018 www.england.nhs.uk/publication/prescribing-gluten-free-foods-in-primary-care-guidance-for-ccgs
- 2. Quality Standard on diagnosis and management of Coeliac Disease National Institute for health and clinical excellence (NICE) October 2016 <https://www.nice.org.uk/guidance/qs134/resources/coeliac-disease-pdf-75545419042501>