Hertfordshire and West Essex Integrated Care System

NHS Hertfordshire and West Essex Integrated Care Board

For use in West Essex

Gluten Free Guidance

Brief Description (max 50 words)	NHS West Essex CCG Board agreed to restrict the prescription of Gluten Free foods to bread and flour mix products for patients diagnosed with Coeliac Disease or Dermatitis Herpetiformis. All other Gluten Free products remain unavailable on prescription.
Target Audience	All Prescribers, Public and Patients

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Accountable Officer	Managing director
Responsible Officer	Primary Care Lead
Date Approved	
Approved By	
Date Summary presented to Board	
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Stakeholders engaged in development/review	Medicines Optimisation Programme Board STP Partners and neighbouring CCGs
Equality Impact Assessment	 EqIA_full_assessmen t_template- gluten fre

SUSTAINABILITY STATEMENT: We declare that NHS West Essex Clinical Commissioning Group will demonstrate commitment to promoting environmental and social sustainability through our actions as a corporate body and as a commissioner. We aim to reduce our carbon footprint by 28% from a 2013 baseline by 2020.

Amendment History

Version	Date	Reviewer Name(s)	Comments
1	March 2018	Lara Ellison	For review March 2019
2	Jul 2021	Lara Ellison	Page 1 updated, including EIA
			Addition of 2.3: Suggested monthly quantities of prescribed GF bread/ mix. Link to WECCG GF implementation supporting document added
			Addition of Appendix 1: List of GF products that remain in Part XV of the Drug Tariff
			Removal of appendix 2- Spend by gluten-free food group in West Essex CCG in the 12 months (January 2017 to December 2017)
			For review Nov 2023

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Guidance statement

- NHS West Essex Clinical Commissioning Group advises all prescribers to restrict the prescription of Gluten Free foods to bread and flour mix products for patients diagnosed with Coeliac Disease or Dermatitis Herpetiformis.
- All other Gluten Free products such as pasta, self-raising/ plain flour, pizza bases, cereals/ grains, crackers/ crispbreads, biscuits and cooking aids are no longer routinely available on prescription.
- All patients should be provided with advice about how to eat a balanced gluten-free diet. The charity Coeliac UK can support patients with information about how to achieve a gluten-free diet (https://www.coeliac.org.uk/home/). Further information is also available on the NHS Choices website: https://www.nhs.uk/Conditions/Coeliac-disease/Pages/Treatment.aspx
- The mitigation of possible adverse impacts of this guidance is covered in the equality and privacy impact assessment. Where necessary, the CCG will support practices to respond to any patient comments or complaints.
- The guidance recognises the duty of care for our patients and where necessary enables GPs to prescribe where there may be safeguarding concerns.

1. Background

1.1 This document describes the NHS West Essex Clinical Commissioning Group (referred to as "the CCG" hereafter) guidance for:

- The prescribing of gluten-free foods.

1.2 The CCG's budget needs to pay for most of the area's health care, everything from medicines and minor treatments to complex surgical procedures and support for long-term conditions. Our population is growing and the numbers and costs of new medicines and treatments are also increasing. As much as we would like to, we cannot afford to pay for everything. Some difficult choices have to be made about what the CCG can or cannot afford to spend.

1.3 A National Consultation conducted by The Department of Health & Social Care (DHSC) on whether gluten free foods should continue to be prescribed ran from March- June 2017. Almost 8,000 responses were received from a wide range of stakeholders including patients, health care professionals, national associations, manufacturers of gluten-free foods, charities and NHS organisations. The outcome published on the 1st February 2018 stated:

- The preferred option is **to retain a limited range of bread and mix products on prescription**. This means that GF foods from the following categories will no longer be available for prescribing; biscuits, cereals, cooking aids, grains/flours and pasta.
- Work will begin on amending the National Health Service (General Medical Services Contracts)(Prescription of Drugs etc.) Regulations 2004, Schedule 1, and then **removing these products from the Drug Tariff**.
- Guidance officials will engage with key stakeholders to ensure **that the range of products that remain in Part XV of the Drug Tariff will be cost effective** for NHS prescribing **and provide patients with basic provisions** to support adherence to a GF diet.
- A list of GF products that remain in Part XV of the Drug Tariff can be found in Appendix 1.

1.4 In light of the national consultation outcome, the CCG Board in March 2018 made a decision to restrict the prescription of Gluten Free foods to bread and flour mix products for

patients diagnosed with Coeliac Disease or Dermatitis Herpetiformis. All other Gluten Free products are no longer available on prescription.

1.5 Coeliac disease is an autoimmune condition associated with chronic inflammation of the small intestine, which can lead to malabsorption of nutrients. It is a relatively common condition and population screening studies suggest that in the UK, 1 in 100 people are affected. The complications of coeliac disease (which may or may not be present at diagnosis) can include osteoporosis, ulcerative jejunitis, malignancy (intestinal lymphoma), functional hyposplenism, vitamin D deficiency and iron deficiency.

1.6 The main treatment for coeliac disease is a lifelong gluten-free diet. Most people report a rapid clinical improvement after starting a gluten-free diet. Patients should receive specific education and information from a registered dietitian, such as advice on alternative foods to maintain a healthy and varied diet, to help them increase the likelihood of adherence and a positive prognosis.

1.7 Historically, gluten-free products have not always been widely available and receiving them via prescription was often the only way that patients could access them. However awareness of coeliac disease, gluten sensitivity and other similar conditions is on the increase. This, as well as a general trend towards eating less gluten, means that gluten-free food has become more accessible to all. An increasingly varied range of gluten-free foods are now available from shops, supermarkets and online retailers.

1.8 The price paid by the NHS for gluten-free foods on prescription is much higher than the prices of similar food products found in supermarkets. In some cases, the NHS has to pay three to four times more than a customer would, to purchase an equivalent gluten-free product. There are often many additional costs to the NHS including pharmacy fees and distributor delivery charges.

1.9 The CCG notes that some gluten-free foods that are considered to remain a staple part of many people's diet such as bread are more expensive than their gluten-containing equivalents. Furthermore, smaller/local/ budget shops do not always stock a range of GF food and some prescription products are fortified to provide additional nutrients to patients to avoid malnutrition or vitamin deficiency.

1.10 Prescribing only GF bread and mix products will ensure patients receive a supply of staple foods on the NHS that are not only considered to be cost effective but will also contribute to reducing the cost of maintaining a GF diet that is incurred by the patient.

1.11 Prescribing of pasta and pizza bases is not recommended as these foods are available from supermarkets at a similar cost to their gluten containing equivalents and therefore the patient is not unfairly disadvantaged by having to purchase these foods.

1.12 Prescribing is not recommended for items considered to be treats such as GF cakes and biscuits. This supports the national campaign for healthy eating.

1.13 Prescribing GF flour (such as plain or self-raising flour) is not recommended as these products are less versatile and more difficult to bake with than GF mix products.

2. Development and Consultation

2.1 West Essex CCG supports the outcome of the National Consultation to restrict prescribing of gluten free products to bread and mix products only.

2.2 A list of GF products that remain in Part XV of the Drug Tariff can be found in Appendix

2.3 Following consultation with local clinicians, suggested appropriate quantity of prescribed gluten free bread/ mix products is 8 to 10 units per person per month, regardless of age or gender, whereby 1 x 400g bread = 1 unit and 1 x 500g mix = 2units. See here for further information.

3. Scope

3.1 This guidance applies to all GPs and prescribers working in our member practices, whether permanent, temporary or contracted-in (either as an individual or through a third party supplier).

3.2 The guidance applies to all patients, including those who are exempt from prescription charges.

3.3 The guidance does not apply to patients requiring therapeutic dietary treatment for the management of inherited metabolic diseases, such as low protein foods.

3.4. Exclusions would include safeguarding concerns of at risk patients.

4. Definitions

4.1 NHS West Essex CCG (WECCG) serves the communities in Epping Forest, Harlow and Uttlesford and the surrounding areas, approximately 300,000 people.

- The Board is led by elected GPs, a senior nurse, lay members, senior NHS managers and a secondary care consultant. Public Health and Social Services are also represented.
- It is responsible for an annual budget of over £380m
- It plans and buys healthcare through:
    - assessing local needs
    - listening to patients and public
    - working in partnership
    - designing services and agreeing contracts
    - WECCG manages quality and performance

4.2 Coeliac disease is an autoimmune disease caused by a reaction to gluten.

4.3 Coeliac UK is an independent charity supporting people with coeliac disease.

4.4 Gluten-free food is food made from products that do not contain the protein gluten which is found in grains such as wheat, barley and rye. A gluten-free diet is primarily used to treat coeliac disease.

4.5 NHS prescription charges are paid by patients for drugs or other treatments prescribed for them by a National Health Service medical practitioner.

4.6 Safeguarding means protecting people's health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect. Each GP practice has a safeguarding lead.

4.7 At risk can be due to health, social care needs or disabilities to enable people to live free from abuse or neglect.

5. Process for implementation

5.1 Existing patients

Practices were supported to undertake clinical system searches to identify patients receiving prescriptions for gluten-free food. Identified patients received a letter from their GP (appendix 2) explaining the new guidance. They were provided with advice on the importance of maintaining a gluten-free diet, either through naturally gluten-free foods or buying gluten-free food from pharmacies, supermarkets etc.

5.2. Newly diagnosed patients

GPs will support all patients with newly diagnosed coeliac disease though providing appropriate advice and support according to this guidance, stressing the importance of a gluten-free diet and referring them to resources such as on the Coeliac UK website. Patients will be counselled to make them aware of how to achieve a gluten-free diet, either through naturally gluten-free foods and/or buying gluten-free food from pharmacies, supermarkets etc. Patients also have the option of a dietitian referral.

5.3 Prescribing messages are available on clinical systems (Scriptswitch and Ardens).

Appendix 1- List of GF products retained in Part XV of the Drug Tariff.

GLUTEN-FREE PRODUCTS

(Not necessarily low-protein, lactose or sucrose free) for Coeliac Disease and Dermatitis Herpetiformis

For England - Gluten-free Bread and Mixes

Barkat gluten-free all-purpose flour mix
Barkat gluten-free brown rice bread
Barkat gluten-free hi-fibre bread mix
Barkat gluten-free par-baked baguettes
Barkat gluten-free par-baked rolls
Barkat gluten-free par-baked white bread sliced
Barkat gluten-free multigrain rice bread
Barkat gluten-free white rice bread
Barkat gluten-free wholemeal sliced bread

Ener-G gluten-free brown rice bread
Ener-G gluten-free dinner rolls
Ener-G gluten-free rice loaf
Ener-G gluten-free Seattle brown loaf
Ener-G gluten-free tapioca bread
Ener-G gluten-free white rice bread

Finax gluten-free coarse flour mix
Finax gluten-free fibre bread mix
Finax gluten-free flour mix

Genius gluten-free brown sandwich bread sliced
Genius gluten-free seeded brown farmhouse loaf sliced
Genius gluten-free white sandwich bread sliced

Glutafin gluten-free 4 white rolls
Glutafin gluten-free baguettes
Glutafin gluten-free bread mix
Glutafin gluten-free fibre bread mix
Glutafin gluten-free fibre loaf sliced
Glutafin gluten-free high fibre loaf sliced
Glutafin gluten-free multipurpose white mix
Glutafin gluten-free part-baked 2 long white rolls
Glutafin gluten-free part-baked 4 fibre rolls
Glutafin gluten-free part-baked 4 white rolls
Glutafin gluten-free Select bread mix
Glutafin gluten-free Select fibre bread mix
Glutafin gluten-free Select fibre loaf sliced
Glutafin gluten-free Select fresh brown loaf sliced
Glutafin gluten-free Select fresh seeded loaf sliced
Glutafin gluten-free Select fresh white loaf sliced
Glutafin gluten-free Select multipurpose fibre mix
Glutafin gluten-free Select multipurpose white mix
Glutafin gluten-free Select seeded loaf sliced
Glutafin gluten-free Select white loaf sliced
Glutafin gluten-free wheat-free fibre mix
Glutafin gluten-free white loaf sliced

Innovative Solutions gluten-free bakery blend

Just: gluten-free good white bread sliced
Just: gluten-free good white rolls
Just: gluten-free white sandwich bread

Juvela gluten-free bread rolls
Juvela gluten-free fibre bread rolls
Juvela gluten-free fibre loaf sliced
Juvela gluten-free fibre loaf unsliced
Juvela gluten-free fibre mix
Juvela gluten-free fresh fibre loaf sliced
Juvela gluten-free fresh fibre rolls
Juvela gluten-free fresh white loaf sliced
Juvela gluten-free fresh white rolls
Juvela gluten-free harvest mix
Juvela gluten-free loaf sliced
Juvela gluten-free loaf unsliced
Juvela gluten-free mix
Juvela gluten-free part-baked fibre bread rolls
Juvela gluten-free part-baked fibre loaf
Juvela gluten-free part-baked loaf
Juvela gluten-free part-baked white bread rolls

Lifestyle gluten-free brown bread
Lifestyle gluten-free brown bread rolls
Lifestyle gluten-free high fibre bread rolls
Lifestyle gluten-free white bread rolls

Mums Mill gluten-free quick bread mix

Proceli basic mix
Proceli gluten free part-baked baguettes

Tobia Brown Teff Bread Mix
Tobia White Teff Bread Mix

Tritamyl gluten-free brown bread mix
Tritamyl gluten-free flour mix
Tritamyl gluten-free white bread mix

Warburtons gluten free brown bread sliced
Warburtons gluten free brown rolls
Warburtons gluten free white bread sliced
Warburtons gluten free white rolls

Drug Tariff, July 2021

Any Gluten Free Products not listed have been removed from drug tariff and should not be prescribed.

Appendix 2- Patient information letter.

NHS
Hertfordshire and
West Essex
Integrated Care Board

For use in West Essex

Changes to the local NHS guidance on prescribing gluten-free

Dear Patient,

We are writing to you to update you on the changes that will affect everyone in our area who receives gluten-free food on prescription. NHS West Essex Clinical Commissioning Group (CCG) – the local NHS organisation which plans and pays for healthcare in this area, has made a decision that gluten-free foods will be restricted to bread and/ or flour mix products. This means all other gluten free items such as pasta, self-raising/ plain flour, pizza bases, cereals/ grains, crackers/ crispbreads, biscuits and cooking aids will no longer be available on prescription. This decision follows the outcome of a National Consultation that was conducted by The Department of Health & Social Care (DHSC) which concluded a limited range of bread and mix products are to be retained on prescription.

In the past, specialist gluten-free products were not widely available, and receiving them on prescription was often the only way to get them. However, awareness of coeliac disease, gluten-sensitivity and other similar conditions is on the increase and a varied range of gluten-free foods is now available from shops, supermarkets and online. Changes to the law mean food labelling has improved, making it easier to see which foods contain gluten.

There is also lots of good information available about eating a healthy and balanced diet which is naturally free from gluten. Coeliac UK has produced lots of information about how to eat a gluten-free diet which you may find useful. You can find this on the charity's website: www.coeliac.org.uk or by calling their helpline on 0333 332 2033 (local call rates apply).

If you are concerned about your health, it is very important that you make an appointment to talk to your GP or drop in to see a community pharmacist. If you would like to raise your concerns regarding the content of this letter, you can contact the CCG's *Patient* Advice and *Liaison* Service (PALS) Experience Team using the following details:

Telephone: 01992 566 122

Email: **weccg.comments@nhs.net**

In writing: The Patient Experience Team,
NHS West Essex CCG,
Building 3, Spencer Close,
St. Margaret's Hospital,
The Plain,
Epping, Essex, CM16 6TN

Yours sincerely,

Medicines Optimisation Team, NHS West Essex CCG.