

# Consultation

## on gluten-free prescribing:

### Tell us your views



# 1. How we commission NHS services

The NHS is funded through taxation and this provides a fixed budget to buy and provide health services for the whole population. Commissioning health services is about understanding the health of our local population, planning what services to buy to meet those needs and monitoring the quality of services that are delivered.

The Bradford clinical commissioning groups (CCGs) are responsible for assessing the needs of people living in Bradford and buying your health services.

The challenge faced by organisations across the NHS is how to spend their allocated budgets in a way that benefits the health of the whole population while making sure that services also meet the needs of individuals and deliver value for money.

Overall, the NHS is facing a massive financial challenge. There is a gap between what we need to spend to keep up with demand, and the money we have, of approx. £20bn.

Despite our extremely strong record of financial management, our CCGs are facing their own financial challenges, largely due to ever increasing demand for an expanding range of services locally. In Bradford Districts CCG, this gap is around £10.4m, and £2.6m in Bradford City CCG, in 2016/17.

Without making savings now, money will not be available for the future transformation of services; so we must look at how we can innovate, be more productive, prevent NHS resources being used inappropriately and ensure services are still of the highest quality.



Funding gap  
2016/17 in  
Bradford  
Districts  
CCG



Funding gap  
2016/17 in  
Bradford  
City CCG

## 2. What is this document about?

Like all organisations across the NHS, we regularly review all the services we commission to make sure that we are using NHS funds appropriately and fairly.

We are constantly looking for ways to save money without impacting on patient care and this means

that we have to look at how we can do things differently.

As part of the QIPP (Quality, Innovation, Productivity and Prevention) programme, we want to review our policy on the prescribing of gluten-free foods.

**We are proposing to change the way we prescribe gluten-free food. In this document, we will explain why we want to make this change and we would like to hear your views on our proposals.**



### 3. What is gluten-free food and why do people need to follow a gluten-free diet?

Gluten is a type of protein that is found in three types of cereals: wheat, barley and rye.

Gluten-free foods are recommended for people who have been medically diagnosed with coeliac disease or gluten-sensitivity conditions, and who want to continue to eat similar foods to the ones that contain gluten. But it's important to remember that lots of foods are naturally gluten-free: fresh fruit and vegetables, meat, poultry, fish, cheese, eggs and lentils; and people can live a perfectly healthy life without the need to eat any gluten related products.

Eating gluten-free foods, which are commercially manufactured, is a lifestyle choice – people do not have to eat these foods to live well.

Coeliac disease is a long-term condition that affects about one in every 100 people in the UK and is a life-long, serious autoimmune disease



Number of people affected by coeliac disease

caused by the immune system reacting to gluten. This damages the surface of the small bowel (intestines) disrupting the body's ability to absorb nutrients from food. The only way to reverse this damage is to remove gluten from the diet.

Some people also choose to follow a gluten-free diet for other reasons: this is a lifestyle or diet choice, so they cannot be prescribed gluten-free foods.

### 4. Why do people have gluten-free food prescribed by the NHS?

There is no cure for coeliac disease and the only treatment for the condition is a strict gluten-free diet for life.

The NHS has been prescribing gluten-free food for over 30 years. Back then, gluten-free foods were not easily available to buy in shops. The NHS has historically prescribed gluten-free foods to patients, but the range and availability of gluten-free products has increased dramatically, with most supermarkets now stocking a wide range, and prices have come down.

It is also much more expensive for the NHS to supply gluten-free foods to patients than it is for patients to buy them because this has to be done through the same prescription process that is used to deliver medicines.

For example, gluten-free flour can cost the NHS up to four times more than it costs in supermarkets, and bread can cost double of a supermarket gluten-free loaf.



Number of years the NHS has prescribed gluten-free foods

## 5. Our current guidelines

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**Patients can be prescribed gluten-free food if they have received a diagnosis of coeliac disease by a doctor.**

Access to gluten-free foods on prescription is managed through GPs and items are supplied by pharmacists. In England, prescriptions for gluten-free food are not free of charge unless you qualify for free prescriptions. People can also buy a pre-payment certificate.

We currently allow the prescription of a limited number of gluten-free items per month for patients who have received a medical diagnosis

of coeliac disease. These standard items include: bread loaves, bread rolls, bread/flour mix, plain savoury crackers, crisp breads, pasta, unsweetened breakfast cereal and pizza bases.

Depending on age, a patient can receive a number of gluten-free 'staple' foods each month, as per Coeliac Society guidance, with extra items allowed for breastfeeding women and women in the third trimester of pregnancy.



## 6. What is the cost of gluten-free products to the NHS?

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The NHS spends about £25 million a year on prescribing gluten-free food.



The Bradford CCGs could save more than £320,000 each year if they stopped prescribing gluten-free food, which could be used to fund other healthcare.



# 7. Why are we proposing a change to gluten-free prescribing?

We considered how we can use our prescribing budget in the most effective and equitable way to improve the health of our whole population.

We have been reviewing treatments that are shown to be less clinically effective, provide insufficient health benefits and those that do not represent good value for money. We have reviewed gluten-free prescribing against these measures and have considered the following evidence:

- there is no strong clinical evidence that patients who receive gluten-free food on prescription are more likely to comply with a gluten-free diet or have better health outcomes than those who do not
- there are a number of naturally gluten-free carbohydrates which are widely available that can be used instead of foods like bread and pasta. These include rice, potatoes and flour alternatives such as millet and corn flour
- as a protein, gluten is not essential to diet and can be replaced by other foods
- there is lots of information available to patients via their GP, dietitian or online about how to eat a healthy gluten-free diet
- changes to the law mean food labelling has improved and it's easier to see which foods contain gluten
- we have done a quality impact assessment and we don't believe that this proposed change will impact the quality of healthcare that patients currently receive
- we could invest the money we spend on gluten-free prescribing, over £320,000 on other services which would benefit more patients. This is the equivalent cost of about 40 hip operations or 40 coronary artery bypass procedures, or 200 days use of an intensive care bed
- the NHS does not provide food on prescription for other groups of patients whose conditions are associated with, or affected by, the type of food they eat. For example, diabetics, people with high blood pressure or high cholesterol. These are also conditions which can be managed by eating a diet naturally free from certain ingredients. We need to balance the health and wellbeing of the affected patients with the need to share our resources equitably across all our population.



Could pay for...



40 hip operations



40 coronary artery bypass procedures



200 days use of an intensive care bed



## 8. What changes are we proposing to gluten-free prescriptions?

As a result of this review, we are considering changing the prescribing policy for gluten-free foods.

While we recognise that these proposals may not be supported by patients who currently receive gluten-free foods on prescription, we believe that it won't impact the quality of clinical care patients receive.

The options we are considering are:

- to recommend and support GPs to stop providing gluten-free food on prescription
- to only prescribe gluten-free food for patients aged under 16
- support voluntary and community services (VCS) organisations to supply gluten-free products at lower cost through their community outlets
- limit the range of gluten-free foods to five or six staple items.

## 9. How are we engaging on these proposals?



We have already discussed these proposals with our clinical boards, local GPs and People's Board, and are reviewing what other areas have done or are considering doing about gluten-free prescribing.



We are now inviting patients, stakeholders, the wider public and local health professionals to tell us their views on our proposals to change how we prescribe gluten-free foods by completing the following questionnaire.

Your responses will be used as part of a report which will help to inform the CCGs' final decision. Please tell us your views no later than 30 September 2016.



You can fill in the form at the end of this leaflet and return it to: Gluten-free consultation, Freepost RTEK-UHKG-UBEK, Douglas Mill, Bowling Old Lane, Bradford, BD5 7JR.  
You do not need a stamp.



Or you can complete the survey online at: [www.bradforddistrictscg.nhs.uk/get-involved/give-us-your-views/](http://www.bradforddistrictscg.nhs.uk/get-involved/give-us-your-views/)  
Or you can reply by email to: [consultation@bradford.nhs.uk](mailto:consultation@bradford.nhs.uk)



**Public meetings:**

You can attend drop-in sessions on the following dates; there is no need to book:

- Tuesday 9 August, 3pm to 4.30pm, Windhill Community Centre, Church Street, Shipley, BD18 2NR
- Tuesday 23 August, 6.30pm to 8pm, at Frizinghall Community Centre, Midland Road, Bradford, BD9 4HX
- Wednesday 7 September, 3pm to 4.30pm, at Park Lane Centre, Bradford, BD5 0LN

# 10. Questions

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We would like to hear your views on our proposals for the prescribing of gluten-free foods for patients who have been diagnosed by a doctor as having coeliac disease. We would particularly like to hear from those affected by the proposals, but everyone's views are welcome as this consultation affects the way the local NHS spends public money on healthcare.

**1. Which of the following applies to you? (multiple choice)**

- I have been diagnosed by my doctor as having coeliac disease
- I am the parent/guardian of a child with coeliac disease
- I am a carer of an adult with coeliac disease
- I am responding on behalf of someone who has coeliac disease
- I am a clinician, for example a GP / nurse or consultant (please state below)
- I am responding on behalf of a group or organisation (please state below)
- I do not have coeliac disease
- Other (please specify below)

**2. Which GP practice are you registered with?**

Name of practice

**3. Do you (or the person you care for) receive gluten-free foods on prescription? If no, please go straight to question 6.**

- Yes
- No

**4. If you receive gluten-free food on prescription, please tell us why? (tick all that apply)**

- I am on a low income
- The food available on the High Street / in supermarkets is too expensive
- The choice is limited where I live
- It helps to make sure I have regular GP check-ups
- I am eligible for free prescriptions
- I have been diagnosed by my doctor as having coeliac disease and believe the NHS should provide gluten-free food for me
- Other – please state below

**5. Is it appropriate that the NHS provides gluten-free food on prescription for those who need it?**

- Yes – please give us your reasons why in the box below

- Not sure
- No

Continues overleaf

6. **Should people who need gluten-free food buy it themselves?**

Yes       Not sure       No

7. **Is it difficult to find gluten-free food in your area?**

Yes       Not sure       No

8. **Would you consider buying your own gluten-free food, at lower cost, through community outlets?**

Yes       Not sure       No

9. **Please use the space below to add any other comments on the proposals or other suggestions. If you need more space to write, please use an extra sheet of paper.**

10. **We would like to obtain views through this survey from all parts of our community. To help with this, we would be grateful if you could answer a few questions. Any information you provide will remain anonymous.**

Your year of birth

Your gender

Your ethnic origin

Your sexual orientation

Your religion or belief

Do you consider yourself to have a disability?

(please state)

11. **If you would like us to provide you with an update on these proposals, please give us your name and contact details so we can get in touch.**

Name

Email

Postal address (incl postcode)

Phone number

**After completion, please detach along perforation, put in an envelope and send to: Freepost RTEK-UHKG-UBEK, Douglas Mill, Bowling Old Lane, Bradford, BD5 7JR. (no stamp required). Form to be received no later than 30 September 2016.**