

**WOLVERHAMPTON CCG**

**GOVERNING BODY**

**8 May 2018**

**Agenda item 9**

<b>TITLE OF REPORT:</b>	<b>NHS England Consultation on Gluten Free Prescribing</b>
<b>AUTHOR(s) OF REPORT:</b>	Hemant Patel, Head of Medicines Optimisation
<b>MANAGEMENT LEAD:</b>	Sally Roberts, Chief Nurse and Director of Quality
<b>PURPOSE OF REPORT:</b>	<p>This report requests the Governing Body support the principle on Gluten Free (GF) Prescribing.</p> <p>To support the GP members views with respect to implementation.</p> <p>To acknowledge the legal advice provided by Mills &amp; Reeve.</p>
<b>ACTION REQUIRED:</b>	<input checked="" type="checkbox"/> <b>Decision</b> <input checked="" type="checkbox"/> <b>Assurance</b>
<b>PUBLIC OR PRIVATE:</b>	Public. The outcome will be uploaded onto the consultation website
<b>KEY POINTS:</b>	<ul style="list-style-type: none"> <li>• NHS England has completed a consultation exercise on developing guidance for CCGs on Gluten Free Prescribing in Primary Care.</li> <li>• The guidance aims to reduce unwarranted variation by providing clear guidance to CCGs on Gluten Free Prescribing in Primary Care to ensure that best value is obtained from prescribing budgets.</li> <li>• Governing Body are asked to consider the evidence supplied in order to support the recommendations made .</li> <li>• Mills &amp; Reeve advice is to undertake a degree of engagement and involvement with patients and clinicians.</li> </ul>
<b>RECOMMENDATION:</b>	<p>That the Governing Body</p> <ol style="list-style-type: none"> <li>1) Support the principle outcome of the NHS England consultation on Gluten Free Prescribing in Primary Care.</li> <li>2) Await further national review, expected Dec 2018 with regards restriction of additional products.</li> </ol>
<b>LINK TO BOARD ASSURANCE FRAMEWORK</b>	



AIMS & OBJECTIVES:	
1. Improving the quality and safety of the services we commission	The report seeks to gain Governing Body support for the outcome of the NHS England consultation in order for the CCG to begin working to align prescribing with NHS England recommendations
2. Reducing Health Inequalities in Wolverhampton	
3. System effectiveness delivered within our financial envelope	Working to support the recommendations in the guidance from NHS England on prescribing will aim to support the management of the prescribing budget.

## 1. BACKGROUND AND CURRENT SITUATION

- 1.1. Wolverhampton CCGs has historically supported the coeliac society recommendations with regards the availability of healthy Gluten Free foods and fall in line with the recommending number of units of GF foods available on prescription. NHS England has undertaken a national consultation on the development of guidance for CCGs on Gluten Free Prescribing in primary care. A public consultation was launched on 31st March 2017 and was open for submission of responses to 22nd June 2017. The outcome was published on 31<sup>st</sup> January 2018 and is available on the NHS England website  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/678181/report\\_of\\_responses\\_-\\_gluten\\_free\\_food\\_prescribing\\_consultation.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/678181/report_of_responses_-_gluten_free_food_prescribing_consultation.pdf)
- 1.2. The Government reported in January 2018 that the preferred option was to retain a limited range of bread and mix products on prescription. Accordingly, biscuits, cereals, grains/flours and pasta will no longer be available on prescription and will be removed from the Drug Tariff. Policy 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.
- 1.3 Legal advice states once the regulations have been amended, the CCG will be required to implement them.



- 1.4 The CCG should await the impact of the regulatory changes before proceeding with a full patient consultation exercise on further restriction of Gluten Free prescribing. The CCG currently spends £164K on GF prescribing. With regulatory changes adopted the potential overall annual saving will be £56k. In addition the department of health are working with manufacturers and patients to produce a finite list which aims to reduce the spend further, this is likely to be regulatory in application and is expected to be completed in Dec 18
- 1.5 During the NHSE consultations on GF prescribing in Primary Care, WCCG advertised the consultations to the Wolverhampton public on the CCG website, via a featured article on the home page, which linked directly to the NHSE consultation web pages. With the support of CSU Communication and Engagement Team, the CCG will be making practices and patients aware of the recommendations and proposed changes and supporting the transition.

## **2. NHS England Consultation outcome**

- 2.1 The consultation sought views on three options:

Option 1: Make no changes to the National Health Service (General Medical Services Contracts) (Prescription of Drugs etc.) Regulations 2004.

Option 2: To add all GF foods to Schedule 1 of the above regulations to end the prescribing of GF foods in primary care.

Option 3: To only allow the prescribing of certain GF foods (e.g. bread and flour) in primary care, by amending Schedule 1 of the above regulations.

The health minister preferred option 3, to restrict prescribing to certain GF products. This is likely to result in retaining a smaller range of bread and mixes, as the preferred product types following the consultation. To implement changes to the availability of GF foods requires the amendment of Schedule 1 to the National Health Service (General Medical Services Contracts) (Prescription of Drugs etc.) Regulations 2004, and amending the list of approved GF products in Part XV of the Drug Tariff.

### **2.2 Equality and Health Inequalities**

An Equality and Health Inequalities Assessment (EHIA) has been undertaken.

Detailed information can be found at <https://www.england.nhs.uk/about/equality/>



### **3 CLINICAL VIEW**

- 3.1 Local discussions with Governing Body members have fully supported the recommendations made within this report.

### **PATIENT AND PUBLIC VIEW**

- 3.2 The national consultation received nearly 8K responses seeking public and patient views on this matter and the CCG had made the link to the consultation available on its website. Further restriction of any GF foods will require local consideration for consultation.

### **4 KEY RISKS AND MITIGATIONS**

- 4.1 Potential reputational damage, however, this is mitigated by national regulatory requirement.
- 4.2 Potential for additional prescribing of allowable foods, however, this is mitigated by support for the transition and audit.

### **5 IMPACT ASSESSMENT**

#### ***Financial and Resource Implications***

- 5.1 Proposed QIPP saving of £56k (Annual saving).

#### ***Quality and Safety Implications***

- 5.2 There are no quality and safety implications arising from this report.

#### ***Equality Implications***

- 5.3 An Equality and Health Inequalities Assessment (EHIA) has been undertaken. Detailed information can be found at <https://www.england.nhs.uk/about/equality/>

#### ***Legal and Policy Implications***

- 5.4 The NHS England Commissioning recommendations will be implemented by means of legislation, thus it must be complied with by CCGs because it is law.

#### ***Other Implications***

- 5.5 The guidance will impact positively on Medicines Optimisation and the prescribing budget.



**Name** Hemant Patel  
**Job Title** Head of Medicines Optimisation  
**Date:** 25 April 2018

**ATTACHED:**

NHS England Consultation Document Report of Responses Following the Public Consultation on Gluten Free Prescribing

Mills & Reeve - Advice in relation to the implementation of results of national consultations relating to prescribing

**REPORT SIGN-OFF CHECKLIST**

**This section must be completed before the report is submitted to the Admin team. If any of these steps are not applicable please indicate, do not leave blank.**

	<b>Details/ Name</b>	<b>Date</b>
Clinical View & GP member group	GP Members Dr Stone	31/01/18 17/04/18
Public/ Patient View	Provided via consultation	13/02/2018
Finance Implications discussed with Finance Team	N/a at this stage	
Quality Implications discussed with Quality and Risk Team	Sally Roberts	19/04/18
Equality Implications discussed with CSU Equality and Inclusion Service	N/a	
Information Governance implications discussed with IG Support Officer	N/a	
Legal/ Policy implications discussed with Corporate Operations Manager	N/a	
Other Implications (Medicines management, estates, HR, IM&T etc.)	As per report	
Any relevant data requirements discussed with CSU Business Intelligence	N/a	
<b>Signed off by Report Owner (Must be completed)</b>	<b>Hemant Patel</b>	<b>25/04/2017</b>

