

# Public consultation on stopping NHS prescriptions for gluten-free bread and bread mixes in Cheshire and Merseyside

Supporting document



# Public consultation on stopping NHS prescriptions for gluten free bread and bread mixes in Cheshire and Merseyside

## Share your views

### What's happening?

Gluten free bread and bread mixes are sometimes prescribed to individuals who live with coeliac disease, or other diagnosed conditions which mean that people have to follow a gluten free diet.

**NHS Cheshire and Merseyside Integrated Care Board (ICB) – the organisation responsible for planning local health care services – is proposing to stop making these products available on prescription.**

Between 28 January and 11 March 2025, we are holding a public consultation, so that people can find out more about this and share their views. We will then use the feedback we receive to make a final decision.

### Background

**Coeliac disease** is a long-term autoimmune condition, where the immune system mistakes substances found inside gluten as a threat to the body and attacks them, which damages the surface of the small bowel, disrupting the body's ability to absorb nutrients from food.

**Dermatitis herpetiformis** is a skin condition associated with coeliac disease and gluten intolerance, which occurs as an itchy skin rash that commonly appears on the elbows, knees and buttocks.

Coeliac disease and dermatitis herpetiformis are usually treated by excluding foods that contain gluten.

In the past, GPs were able to prescribe some gluten free foods to people with coeliac disease, or other diagnosed conditions that meant they weren't able to eat gluten.

In 2018, new national guidance was released recommending that only gluten free bread and bread mixes should be made available on prescription.

Currently, most areas of Cheshire and Merseyside follow this national guidance, however there are some differences, which we describe in the next section.

### Who currently gets gluten free bread and bread mixes on prescription?

Cheshire and Merseyside is made up of nine areas, sometimes known as 'places'. These are: Cheshire East, Cheshire West, Halton, Knowsley, Liverpool, Sefton, St Helens, Warrington and Wirral.

These areas used to come under separate NHS clinical commissioning groups (CCGs), which were responsible for setting health policies for people living in their area, including policies for gluten free prescribing.

In July 2022, NHS Cheshire and Merseyside took over the responsibilities of CCGs, however the previous policies for each former CCG are still in place, which means that at the moment arrangements for gluten free prescribing are not the same for all areas. This is because some CCGs had previously decided to stop prescribing gluten free products.

The current picture is as follows:

- Gluten free bread and bread mixes are currently available on prescription to all eligible patients in Cheshire East, Halton, Knowsley, Liverpool, Sefton, Warrington and Wirral.
- In Cheshire West, eligible patients registered with a GP Practice in the former NHS Vale Royal CCG footprint (Winsford, Northwich, Middlewich and surrounding areas) can be prescribed gluten free bread and bread mixes, but this is not available to patients registered with a GP practice within the former NHS West Cheshire CCG footprint (Chester, Ellesmere Port and surrounding areas).
- No GP practices within St Helens Place can prescribe gluten free bread and bread mixes.

More than 13,300 people in Cheshire and Merseyside have a diagnosis of coeliac disease or other conditions which mean they need to follow a gluten free diet.

Of these people, around 2,300 currently receive gluten free bread and bread mixes on prescription. The breakdown for each area by age is as follows:

Area	Age Range										Grand Total	% of total coeliac patients in area
	0-9	10-19	20-29	30-39	40-49	50-59	60-69	70-79	80-89	90+		
<b>Liverpool</b>	16	61	28	20	34	67	120	104	66	5	<b>521</b>	23%
<b>Cheshire East</b>	19	64	18	23	22	38	97	98	67	6	<b>452</b>	21%
<b>Wirral</b>	13	42	20	27	28	48	81	75	55	7	<b>396</b>	21%
<b>Sefton</b>	9	34	13	19	10	53	69	74	49	6	<b>336</b>	18%
<b>Warrington</b>	11	24	8	8	8	19	37	35	23	8	<b>181</b>	14%
<b>Knowsley</b>	5	22	11	11	9	21	32	35	24	2	<b>172</b>	17%
<b>Halton</b>	4	17	3	14	10	22	28	31	9	3	<b>141</b>	18%
<b>Cheshire West</b>	2	8	5	3	11	10	18	19	11	2	<b>89</b>	11%
<b>St Helens</b>	0	0	0	0	0	0	0	1	1	0	<b>2</b>	0%
<b>Grand Total</b>	<b>79</b>	<b>272</b>	<b>106</b>	<b>125</b>	<b>132</b>	<b>278</b>	<b>482</b>	<b>472</b>	<b>305</b>	<b>39</b>	<b>2290</b>	

\*Separate figures for dermatitis herpetiformis are not provided as the majority of people with this condition also have a diagnosis of coeliac disease.

The NHS charges for most items given on prescription (currently this cost is £9.90 per item), however some people are eligible for free prescriptions, so don't need to pay this charge.

99% of prescriptions given for gluten free bread and bread mixes in Cheshire and Merseyside are not charged. The main category used for these free prescriptions is age: 60% are because someone is over 60, and 13% because someone is under 16 (or 18 if in full time education).

## **What we are proposing**

NHS Cheshire and Merseyside is proposing that in the future, gluten free bread and bread mixes are no longer available on NHS prescription.

This would mean that GPs wouldn't be able to prescribe them, so if people wanted them, they would need to buy these products themselves. If the change went ahead, it would apply to all areas of Cheshire and Merseyside, and to both adults and children.

## **Why are we proposing this change?**

### **1. Consistency across different areas**

NHS Cheshire and Merseyside wants everyone who lives in Cheshire and Merseyside to have the same level of health care access, but currently this isn't the case for gluten free prescribing. The proposed change would mean that the same guidance would apply to everyone.

It would also mean that the approach for people who can't eat gluten is the same as for other food allergies and intolerances, such as those with lactose intolerance, who do not receive food products on prescription from the NHS.

### **2. Value for money**

Gluten free bread and bread mixes are more expensive than the same products containing gluten, however the price paid by the NHS for these products on prescription is still much higher than in supermarkets.

It is estimated that ending the prescribing of gluten free bread and bread mixes would save the local NHS around £525,000 a year.

NHS Cheshire and Merseyside receives a fixed amount of money from NHS England for local health services, so we need to think about the best way to spend this to get the most benefit for our population.

### **3. Increased accessibility of gluten free products**

One of the reasons gluten free foods were prescribed in the past was that their availability was limited. However, there is now increased awareness of coeliac disease and gluten intolerance, as well as a general trend towards eating less gluten, and these products are now more readily available in most supermarkets and other outlets.

#### **4. Bread and bread mixes are not the only way to get essential nutrients in your diet**

If you have coeliac disease, you must stop eating all sources of gluten for life, however it's possible to eat a balanced gluten free diet without the need for any special dietary foods. This proposal is about stopping prescribing of bread and bread mixes, and although these are a source of key nutrients, it is possible to obtain these from other naturally gluten free foods e.g. brown rice, potatoes, whole grains, leafy green vegetables to achieve a healthy diet. In addition, better labelling of foods means that people are more easily able to see whether ordinary foods are free from gluten.

#### **What other options did we look at?**

NHS Cheshire and Merseyside did not consider keeping things as they currently are, as this would mean continuing with a situation where the approach varies in different areas. Whatever decision we make, we want to make sure that we have a more consistent approach.

We did look at whether to make gluten free products available to **all** eligible patients in our area. It was estimated that to do this would cost around £130,000 extra each year. NHS Cheshire and Merseyside has a duty to make the best use of the limited funding we have available, and for the reasons set out above, we believe that ending all prescribing of gluten free products is a better approach.

We considered whether to limit prescribing to under 18s, however we felt that this would unfairly discriminate against older people, and 60% of prescriptions for gluten free bread and bread mixes are for those over 60 years old.

However, before we make a final decision, we want to understand the views of our population, which is why we are holding this public consultation.

#### **How we will make a decision**

Once this public consultation ends on 11 March 2025, an independent organisation will analyse the feedback received and present it in a report. We will use the findings in this report to make a final proposal about what we do with gluten free prescribing, which will be put to the board of NHS Cheshire and Merseyside for them to make a decision. A paper setting out what is being proposed, together with the public consultation report, will be published on the NHS Cheshire and Merseyside website with our board papers. Our plan is for this to happen at the end of May 2025. We will share the information about the decision once it has been made.

The best way to keep up to date with NHS Cheshire and Merseyside, including our engagement and consultation activity, is to sign up to receive our monthly emails <https://www.cheshireandmerseyside.nhs.uk/latest/sign-up-for-updates/>

#### **How to share your views**

NHS Cheshire and Merseyside wants to find out what people think about our proposal to stop prescribing gluten free bread and bread mixes.

Please complete the questionnaire to tell us your thoughts. The consultation closes on 11 March 2024 – please make sure you've submitted your views by then.

The questionnaire should take no more than ten minutes to complete. Please do not share any personal information in your response (i.e. information that could be used to identify you, such as your name).

### **Get in touch**

If you would like some help to complete the questionnaire or need to request a printed version or an alternative format or language, please contact us using the details below. If you would prefer, we're happy for you to call us to share your questionnaire responses over the phone.

Phone: 0151 295 3052

Email: [engagement@cheshireandmerseyside.nhs.uk](mailto:engagement@cheshireandmerseyside.nhs.uk)

**Ends.**

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