

Stakeholder briefing: gluten free food and over the counter medicines for minor ailments on prescription

1) Introduction

Like other areas in the country, the local NHS is under increasing financial pressure. The demand on NHS services and the costs of new treatments and medicines is more than the money available. To make sure that we are making the best use of NHS money, we are reviewing some of the services we provide. This means sometimes we need to make difficult decisions about what services can be funded.

The changes we make are about using resources more efficiently.

We understand that our decisions can have an impact on different people in different ways. We want to work with patients, carers and local people to make sure that we consider people's views when making decisions about the services that are most needed.

Where we are looking at making a big change to services, we will always engage with the people affected and the wider public about what we want to do.

The Big Health Debate is our patient engagement campaign designed to start the conversation with patients about the challenges the NHS faces. We will be using it this summer to talk to people about a number of potential service changes. The review of gluten free food consultation and the City's over the counter medicine on prescription engagement proposals form part of this wider picture.

2) Gluten free food on prescription

2.1 Consultation

Health commissioners from the four Greater Nottingham Clinical Commissioning Groups are currently consulting on whether the local NHS should restrict or stop gluten free food on prescription.

The six-week consultation runs from **Thursday 14 June to Thursday 26 July** and we are asking people to complete a short survey to help us to understand what people think about the different options.

Patients registered with a GP in areas served by Nottingham City, Nottingham North and East CCG, Rushcliffe CCG and Nottingham West CCG are being asked to give their views about the options being proposed by health commissioners, which are:

- **Limit prescribing for all patients in Greater Nottingham to four units of long life bread and flour per month.** This will mean that the same prescribing model is in place across the south of the county, including the city. It is the closest model to the

national guidance and provides savings for the CCG while still enabling gluten free food to be available on prescription.

- **All Greater Nottingham CCGs to stop all gluten free prescribing, with the exception of children, who will be able to receive up to four units of long life bread and flour per month.** This provides a more significant saving for the CCGs while still allowing gluten free prescribing for children.
- **All Greater Nottingham CCGs to stop all gluten free prescribing.** This means the same restrictions will be in place across Nottinghamshire (except Bassetlaw). It provides the greatest financial saving for the CCGs.

2.2 Current prescribing guidelines

Across Greater Nottingham and Mid-Nottinghamshire, there are currently differences in how much gluten free food is prescribed to people living with coeliac disease - see below.

Nottingham City

Nottingham City currently follow the prescribing guidelines in the table below.

Age and condition	Number of units
Child (1-3 years)	10
Child (4-6 years)	11
Child (7-10 years)	13
Child (11-14 years)	15
Child (15-18 years)	18
Male 19-59 years	18
Male 60-74 years	16
Male 75+ years	14
Female 19-74 years	14
Female 75+ years	12
Breastfeeding	Add 4
3rd trimester pregnancy	Add 1

One unit is the same as: 400g loaf of bread or 250g of pasta or two pizza bases.

South Nottinghamshire (Nottingham North and East, Nottingham West and Rushcliffe)

The CCGs' policy is four units in total of long life bread and/or flour each month on prescription for patients with a diagnosed condition of coeliac disease or dermatitis herpetiformis.

Mid Notts (Mansfield and Ashfield and Newark and Sherwood)

No prescribing of gluten free foods.

2.3 Previous consultations

In 2017, the Government carried out a national consultation about whether gluten free foods should be available on prescription for people with coeliac disease.

The outcome of this consultation was a recommendation that gluten free prescribing should be restricted to bread and mixes only. However, there has been no decision taken about limiting quantities.

Government advice is that Commissioners carry out their own consultation with local people and make their own decisions about what, if anything, to prescribe.

The South Nottinghamshire Commissioners have already conducted a consultation around gluten free food on prescription in 2015, which is when the amount and range was restricted to four units. You can find more about this on the Rushcliffe, Nottingham North and East or Nottingham West CCG websites.

2.4 Greater Nottingham Consultation 2018

The six-week consultation runs from **Thursday 14 June to Thursday 26 July**.

Throughout the consultation, we'd like to hear the views of people living with coeliac disease and dermatitis herpetiformis and also those of the wider public. This is because the decisions we must make about how best to spend budgets will have implications for all Greater Nottingham residents.

We have asked all our practices across Greater Nottingham to promote and display consultation materials. We have also asked, where possible, that they write to their patients who are living with coeliac disease about the consultation and have provided them with a patient letter so they can do this.

We informed Coeliac UK of our consultation and sent all the information to their team. They have responded to the consultation and confirmed that they will email all their local members, which gives us an additional channel to reach people with coeliac disease.

We are inviting local patients, partners, organisations and local clinicians to tell us their views on the options by completing the questionnaire in this document or online.

We sent out stakeholder briefings to partners and community groups and asked them to share the information with their staff, groups and the wider public. Attached to this briefing were copies of the consultation document and promotional posters.

We have also been heavily promoting the consultation via social media and via community groups. We will also be at events over the six weeks and available to talk to people. You can find out more about these events at: www.nottinghamnortheastccg.nhs.uk/nhs/gluten

We have put a targeted effort into reaching City residents, who haven't previously been consulted on gluten free food on prescription and who are currently able to access a lot more food on prescription than the boroughs in the conurbation. To this end, we have four dedicated drop in events at key locations in the City. We have also placed information in the Nottingham Arrow, which goes to every City resident.

Local people can have their say in a number of ways:

- Fill in a consultation document at their GP Practice and return to the Freepost Address
- Complete online at: www.surveymonkey.com/r/GN-gluten-free
- Call: **0115 883 9594** (City patients) or **0115 883 1709** (County patients) for a printed copy or to complete over the phone
- Join us at a drop in session, for dates, and to read the consultation, document: www.nottinghamnortheastccg.nhs.uk/nhs/gluten

3 Over the counter medicines on prescription

3.1 Engagement activity

In January 2017, the South Nottinghamshire CCGs (Nottingham North and East, Nottingham West and Rushcliffe) carried out a six-week engagement campaign to ask people what they thought about proposals to limit over the counter medicines for minor illnesses.

Minor illnesses are those which can be treated with self care and over the counter medicines, which are medicines you can buy in a supermarket, shop or pharmacy. Please note that these proposals were not about the prescribing of over the counter medicines for people with long term conditions.

Around 20% of GP time and 40% of their total consultations are used for these common minor conditions that could be treated without seeing a GP. People that care for themselves have better health and reduced demand for services. This in turn allows more time for health professionals to see patients that require treatment for more complex conditions.

Following the engagement analysis, the recommendation was that over the counter medicines for minor illnesses should be restricted, with the exception that GPs will be able to prescribe in other circumstances of clinical need.

Since the guidelines were published, Nottingham North and East, Nottingham West and Rushcliffe CCGs have seen an estimated saving on self-care medicines of £393,114 in 2017/18. Over this year period there were three patient complaints about the guidelines.

3.2 Government guidance

In early 2018 NHS England went out to consultation on guidelines for CCGs: Conditions for which over the counter items should not routinely be prescribed in primary care. NHSE then issued guidance for CCGs stating that:

The guideline is addressed to CCGs to support them to fulfil their duties around appropriate use of their resources. We expect CCGs to take the proposed guidance into account in formulating local policies, unless they can articulate a valid reason to do otherwise, and for prescribers to reflect local policies in their prescribing practice.

The objective of this guidance is to support CCGs in their decision-making, to address unwarranted variation, and to provide clear national advice to make local prescribing practices more effective. The aim is that this will lead to a more equitable process for making decisions about CCG's policies on prescribing medicines; CCGs will need to take individual decisions on implementation locally, ensuring they take into account their legal duties to advance equality and have regard to reduce health inequalities.

In light of recent Government advice, Nottingham North and East, Nottingham West and Rushcliffe CCG's have updated their guidelines to ensure consistency with National policy and the patient exclusion criteria and conditions are now covered within the local guidelines. These CCGs now adhere to national guidelines for the thirty three conditions nationally recommended for self-care, along with three extra local self-care conditions.

3.3 Conditions

These are the conditions the Government advises can be treated effectively and safely using over the counter medicines.

Treatments for these conditions are no longer recommended on prescription in Nottingham North and East, Nottingham West and Rushcliffe areas.

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| • Acute sore throat | • Dandruff (mild scaling of the scalp without itching) |
| • Conjunctivitis | • Diarrhoea (adults) |
| • Coughs, colds and nasal congestion | • Dry eyes/sore tired eyes |
| • Cradle Cap | • Earwax |

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| • Excessive sweating (hyperhidrosis) | • Minor conditions associated with pain, discomfort and/or fever (e.g. aches and sprain, headache, period pain, back pain) |
| • Haemorrhoids | |
| • Head lice | |
| • Infant colic | • Mouth ulcers |
| • Infrequent cold sore of lips | • Nappy rash |
| • Indigestion and heartburn | • Oral thrush |
| • Infrequent constipation | • Prevention of dental cavities |
| • Infrequent migraine | • Probiotics |
| • Insect bites/stings | • Ringworm/athletes foot |
| • Mild cystitis | • Sunburn due to excessive sun exposure |
| • Mild irritant dermatitis | • Sun protection |
| • Mild acne | • Teething/mild toothache |
| • Mild dry skin | • Threadworm |
| • Mild to moderate hay fever/seasonal rhinitis | • Travel Sickness |
| • Minor burns/scalds | • Vitamins and minerals for prevention/maintenance. |
| | • Warts and verrucae |

The South Nottinghamshire guidance is the same as the above, with the addition of:

- Fungal nail infections
- Upset stomach
- Vaginal thrush

3.4 Exceptions

- There are exceptions to the above and they are listed below:
- Patients prescribed an over the counter treatment for a long term condition (e.g. regular pain relief for chronic arthritis).
- For the treatment of more complex forms of minor illnesses (e.g. severe migraines that are unresponsive to over the counter medicines).
- For those patients that have symptoms that suggest the condition is not minor.
- Treatment for complex patients (e.g immunosuppressed patients).
- Patients on prescription only treatments.
- Patients prescribed over the counter products to treat an adverse effect or symptom of a more complex illness and/or prescription only medications.

- Circumstances where the product licence doesn't allow the product to be sold over the counter to certain groups of patients. This may vary by medicine, but could include babies, children and/or women who are pregnant or breast-feeding.
- Patients with a minor condition suitable for self care that has not responded enough to treatment with an over the counter product.
- Patients where the clinician considers that the presenting symptom is due to a condition that would not be considered a minor condition.
- Circumstances where the prescriber believes in their clinical judgement, exceptional circumstances exist that warrant deviation from the recommendation to self care.
- Individual patients where the clinician considers that their ability to self manage is compromised as a consequence of medical, mental health or significant social vulnerability to the extent that their health and/or wellbeing could be adversely affected, if reliant on self-care.

Next month, as directed by the national guidelines, we will be going out to engagement with Nottingham City residents, who haven't been previously engaged on this issue.