



South Gloucestershire
Clinical Commissioning Group



North Somerset
Clinical Commissioning Group

Equality Impact Assessment on the

Proposed restriction in prescribing of
gluten free foods

North Somerset CCG
South Gloucestershire CCG

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Approved By
Ratification Date
Review Date

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EQUALITY IMPACT ASSESSMENT FRONT SHEET

Name of the policy, practice or service being assessed:
Proposed Restriction on the Prescribing of Gluten Free Food

Is this a new or existing policy, practice, service, etc?	New guidance
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State the context for this EIA (eg service redesign, service commissioning, a QIPP programme, policy or strategy development or review)	QIPP programme
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On which protected characteristics has this Equality Impact Assessment been carried out? (Write Y or N)

Race	Y	Disability	Y	Sex	Y	Religion or Belief	Y	Marriage or Civil Partnership	Y
Age	Y	Sexual Orientation	Y	Gender reassignment	Y	Pregnancy and Maternity	Y	Health impact	Y

Name of person carrying out this Equality Impact Assessment	Tom Gregory (01275 546906)
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Signature	
Date	31/01/17

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STEP 1: GETTING STARTED

Brief description of the policy or practice

It is proposed to restrict the prescribing of gluten free foods to a limited list of items available for patients aged under 18 years only, and to stop prescribing altogether for patients aged over 18 years.

Who is responsible for implementing, monitoring and/or developing the policy or practice?

Medicines Management Teams (MMTs) in North Somerset and South Gloucestershire CCGs have recently investigated options to manage the current cost of gluten free food, where the option of restriction to a limited list of items for patients aged under 18 only was discussed.

Each CCG's MMT will be responsible for the implementation of this guidance, as well as GPs and practice staff and community pharmacies. Monitoring will be undertaken by the MMT.

STEP 2: ESTABLISHING RELEVANCE TO THE PUBLIC SECTOR EQUALITY DUTY

Does the policy or practice affect service users, employees or the wider community, and therefore potentially have a significant effect in terms of equality?

This guidance will affect patients diagnosed with coeliac disease who are also receiving gluten free food on prescription, which is estimated at 40% of diagnosed patients in BNSSG, which translates to approximately 1000 people in North Somerset and South Gloucestershire.

Information from GP practice systems shows that a greater proportion of under 18s and over 60s receive gluten free products on prescription, likely due to these groups receiving free NHS prescriptions. This indicates that a large proportion of other groups are already purchasing gluten free foods.

Does or could the policy or practice affect different “protected groups” differently?

Protected groups are defined by the nine characteristics protected by the Equality Act 2010:

- Age
- Disability including physical and mental impairment
- Gender re-assignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race including nationality and ethnicity
- Religion or belief
- Sex

Age

- This guidance will impact patients aged over 18 who will no longer be able to receive gluten free food on prescription.
- There are other conditions which require dietary management, and foods are not prescribed for these patients; these patients have to make the appropriate choices for their health when purchasing foods in supermarkets.
- Paediatricians/ paediatric dieticians in other areas have made the case that a consequence of children not adhering to a GF diet can result in failure to thrive and that a child is not necessarily able to rationalise the need for restriction in their diet, therefore providing GF foods on prescription helps

parents to provide GF alternatives. There is a neutral impact to under 18s, who are not usually responsible for household food shopping so provision of gluten free food on prescription helps adherence to a gluten free diet,

- There could be a negative impact on elderly, the disabled or people who do not have access to the internet and do not have access to the large supermarkets where gluten free foods to purchase are stocked. Rural areas within the CCG areas may have limited access to larger supermarkets, although these products would be available to order via pharmacies. Most of the major supermarkets offer delivery services, but this is usually only for online orders. If people do not have access to the internet, this may negatively impact their ability to adhere to a gluten free diet, however there is a wide range of foods which are naturally gluten free, which are readily available at a reasonable cost from local convenience shops

Disability

- Coeliac disease is not defined as a disability under the Equality Act 2010, although it is a long term condition.
- This will meet the needs of patients with disabilities (for example learning difficulties) as patients will be signposted to purchase gluten free foods and support to maintain a gluten free diet will be available
- All patients will be encouraged to attend their GP for annual review to ensure that they are following an appropriate diet. In order to prevent the need for patients who multiple long term illnesses to go to the GP for multiple reviews, these can be targeted at the same time, ensuring that patients are reviewed regularly for all conditions.
- Like access to all medicines and services, there could be a negative impact on elderly, the disabled or people who do not have access to the internet and do not have access to the large supermarkets where gluten free foods to purchase are stocked. Rural areas within the CCG areas may have limited access to larger supermarkets, although these products would be available to order via pharmacies, and it is likely that delivery will be offered by both pharmacies and supermarkets.
- Most of the major supermarkets offer delivery services, but this is usually only for online orders. If people do not have access to the internet, this may negatively impact their ability to adhere to a gluten free diet; however patients will still need to buy other foods, and a wide range of staple foods are naturally gluten free.
- There is potential that this may adversely impact those who are socio-economically disadvantaged, however there is no requirement to include specially formulated gluten free foods in the diet. There are a number of staple foods (e.g. rice and potatoes) which are naturally gluten free. Other components of a healthy diet are gluten free, including meat, fish, fruit, vegetables and pulses.

Gender re-assignment

It is anticipated that there will be a neutral impact to adult individuals as it does not differentiate gender reassignment and all adults will be signposted to purchase gluten free food and offered support to maintain a gluten free diet

Marriage and Civil Partnership

It is anticipated that there will be neutral impact to adult individuals as it does not differentiate individuals who are married or in a civil partnership as all adults will be signposted to purchase gluten free food and offered support to maintain a gluten free diet

Pregnancy and Maternity

It is anticipated that there will be no impact as it does not differentiate individuals who are pregnant or who have a child as all adults will be signposted to purchase gluten free food and offered support to maintain a gluten free diet

Race including nationality and ethnicity

It is anticipated that there will be neutral impact to adult individuals as it does not differentiate individuals based on their race or ethnicity as all adults will be signposted to purchase gluten free food and offered support to maintain a gluten free diet, however national data shows that minority ethnic communities are likely to be on a lower income which may negatively impact their ability to purchase gluten free foods, however a wide range of staple foods naturally do not contain gluten.

Religion or belief

It is anticipated that there will be neutral impact to adult individuals as it does not differentiate individuals based on their religion or beliefs as all adults will be signposted to purchase gluten free food and offered support to maintain a gluten free diet

Sex

Data in North Somerset and South Gloucestershire show that coeliac disease is approximately twice as common in women as it is in men, but men find it more difficult to access GP services; however the proposed guidance is not differentiating patients based on their gender.

National data shows that women are more likely to be on a lower income than men, which may negatively impact their ability to purchase gluten free foods, however a wide range of staple foods naturally do not contain gluten, and are widely available.

All adults will be signposted to purchase gluten free food and offered support to maintain a gluten free diet.

Sexual Orientation

It is anticipated that there will be neutral impact to adult individuals to individuals as it does not differentiate based on their sexual orientation as all adults will be signposted to purchase gluten free food and offered support to maintain a gluten free diet

Positive and Neutral Impacts

There will be no impact on patients who are currently not receiving gluten free food, however there will be a positive impact in terms of reducing inequality between patients who obtain gluten free foods on prescription (who may also have free prescriptions) and those who do not, for example due to paying prescription charges.

Other CCGs in the local area, including Somerset, and in the Devon and Cornwall areas have implemented changes to gluten free prescribing, and the option is being explored in Bath and North East Somerset. The proposed changes to prescribing in North Somerset and South Gloucestershire reduce the potential for geographical variation and a “postcode lottery”.

Coeliac UK’s “gluten free guarantee” is helping to promote the need to stock a range of gluten free staples by supermarkets; wider availability of these products will be beneficial to all patients with coeliac disease, not just those who currently obtain supplies on prescription.

Does it relate to an area with known inequalities (for example, access to public transport for disabled people, racist/homophobic bullying)?

It is anticipated that there will be no impact in areas with known inequalities, however if any of the protected groups have poor access to GP services, then there is a potential negative impact of the proposed change to supply of gluten free foods on prescription. The current availability of gluten free food on prescription provides only “staples” and all adults must purchase other foods in order to maintain a healthy diet.

**STOP HERE IF THERE IS NO RELEVANCE TO THE PUBLIC SECTOR
EQUALITY DUTY**