

Reference: FOI.ICB-2324/027

Subject: Inclisiran

*I can confirm that the ICB **does hold the information requested**; please see responses below:*

QUESTION	RESPONSE
<p>Please can you send us all correspondence from the period June 21 to now held within your organisation in relation to the medication Inclisiran, including meetings, contracts, organisation for rollout, costs, correspondence with the Department for Health, Academic Health Science Networks, and uptake.</p>	<p>The ICB has undertaken a search of appropriate system folders and email inboxes and provided all the documents which include the word 'Inclisiran'</p> <p>The ICB has reviewed all the information and made redactions in line with the FOI Act 2000. The ICB has redacted from the response:</p> <p>Personal information of staff. This includes the names of staff across the system, and any other information of a personal nature not related to Inclisiran.</p> <p>Personal information of patients. This includes any information which could identify patients. Including references to specific practices who have contacted the ICB about prescribing for patients. Prescribing numbers for Inclisiran are low and the ICB believes that by releasing individual practice data individuals may be identified.</p> <p>Confidential information. The ICB has not included information which has been sent to the ICB in confidence. This includes the secondary care price of Inclisiran and documents which have been sent to the</p>

ICB from other organisations expressly for the use of clinicians and staff.

Information which would prejudice the effective conduct of public affairs. The ICB has redacted information which if made public would inhibit the ICB's ability to have discussions and make decisions regarding management of and funding of Inclisiran or any future decisions in the future. This includes ICB discussions regarding funding Inclisiran in primary care particularly the amounts discussed and information from other ICBs regarding their discussions for funding Inclisiran.

These redactions have been made in line with the FOI Act 2000 specifically Section 40, Section 41 and Section 36.

Section 40 – Personal information

The ICB has considered the public interest test in terms of the personal information redacted from the response. The request was for all documents which pertain to Inclisiran. The names and personal information of the staff discussing this medication are irrelevant to the discussions and documents themselves. The ICB has considered that there may be interest in the names of staff who have made decisions regarding Inclisiran describing. However, decisions have been made by Committees rather than individuals.

The requested information contains references to individual patients who have been prescribed Inclisiran. This information constitutes health information which is considered Special Category Data. The

ICB does not have a legitimate interest reason to release this data under the FOI Act and has therefore redacted any information which may make patients identifiable. This includes references to specific practices who have contacted the ICB in terms of individual patient queries. The ICB believes that the low numbers of prescriptions from practices plus the location of the practice area, may make patients identifiable. The ICB is unable to seek consent from patients and there is a reasonable expectation that health information would remain confidential, therefore the ICB has no legitimate reason to disclose this personal information as part of the response.

Section 41 – Information provided in confidence

Some of the documents identified have been provided to BNSSG ICB in confidence. This includes documents which contain explicit instructions on the conditions of subsequent use or disclosure which contain information confidential to other organisations. All information redacted through this exemption has been received from another organisation and disclosure would constitute an actionable breach of confidence.

Section 36 - Information which would prejudice the effective conduct of public affairs

Some of the documents identified have not been disclosed as disclosure would inhibit the ability for ICB staff and staff from other organisations to express themselves openly and honestly as part of the process of deliberation.

This includes internal conversations regarding how Inclisiran in primary care would be funded. It is important when making decisions that the ICB has a varied and full range of honest opinions and viewpoints to consider. The ICB believes that disclosure of the information may inhibit free and frank discussions in the future which would damage the quality of advice and deliberation and lead to poorer decision making. It is important that staff feel able to contribute to conversations honestly without concern that those views will be disclosed.

It is vitally important to the local population that the ICB can make robust and considered funding decisions to support the requirement of value for money in the NHS. However, the ICB recognises that there is public interest in how public money is utilised. Therefore, the ICB has disclosed emails and documents which describe the actions the ICB has taken in regards to Inclisiran but has redacted the amounts discussed.

ICBs work closely with local partner organisations, other ICBs and provider organisations to improve services for the local population. It is vitally important that staff can provide advice and viewpoints openly to support robust and quality decision making.

In this case, other organisations have shared their thinking and deliberations regarding Inclisiran to support other organisations to make the right prescribing decisions for their populations. The ICB believes that should these discussions and documents be shared then these organisations may be less inclined to discuss similar matters with the ICB in the future.

It is important when making decisions that the ICB has a varied and full range of opinions and viewpoints to consider. The ICB believes that disclosure of the information may inhibit free and frank discussions in the future which would damage the quality of advice and deliberation and lead to poorer decision making. The ICB believes that it is in the public's interest for other organisations to be able to provide the ICB with their honest opinions. The wider range of opinions and viewpoints received by the ICB, the more robust decision making will be which will result in better health outcomes for the local population.

The ICB has considered that there is a public interest in how decisions are made by the NHS particularly as these decisions involve public money. Therefore, the ICB has disclosed emails and documents which describe the actions BNSSG ICB has taken in regards to Inclisiran.

The information redacted relates to the discussions and decisions of other ICBs in relation to Inclisiran and although BNSSG ICB is unable to disclose these discussions. The requester can request this information from ICB's under the FOI Act.

The ICB's qualified person, Shane Devlin, Chief Executive, has reviewed the use of Section 36 and has provided the reasonable opinion that there is the likelihood of prejudice or inhibition under Section 36(2).

The information provided in this response is accurate as of 12 June 2023 and has been approved for release by Dr Joanne Medhurst, Chief Medical Officer for NHS Bristol, North Somerset and South Gloucestershire ICB.