

<b>Reference:</b>	FOI.20327.26
<b>Subject:</b>	Access to Continuous Glucose Monitoring (CGM)
<b>Date of Request:</b>	29 April 2026

**Requested:**

Please could you provide the following information for your Health Board:

1. Details of your current policy, guidance, or position on access to Continuous Glucose Monitoring (CGM) for people with diabetes.
2. The patient groups who are currently eligible to access CGM (for example by diabetes type, treatment type, age, pregnancy, hypoglycaemia risk, or any other criteria used).
3. Copies of any relevant policies, guidelines, pathways, commissioning decisions, or other documents that describe or support CGM access criteria.
4. If no formal written policy exists, please confirm this and explain how decisions on CGM access are currently made and how clinicians are made aware of the groups that can access/ be prescribed CGM.

**Response:**

Hywel Dda University Health Board (UHB) does not hold all the requested information as it does not have a policy on accessing CGM.

However, whilst operating in accordance with the Section 45 Freedom of Information Code of Practice, the UHB has a duty to provide advice and assistance. The UHB operates in accordance with guidance issued by the National Institute for Health and Care Excellence (NICE), Health Technology Wales (HTW) and the national formulary. Links to the relevant NICE guidance, the HTW appraisal for Real-time continuous glucose monitoring of people with type 1 and 2 diabetes and the Formulary Status for Freestyle Libre 2 and Dexcom One are provided below.

[Recommendations | Type 1 diabetes in adults: diagnosis and management | Guidance | NICE](#)

[Blood glucose management | Type 2 diabetes in adults: management | Guidance | NICE](#)

[Update information | Diabetes \(type 1 and type 2\) in children and young people: diagnosis and management | Guidance | NICE](#)

[Overview | Diabetes in pregnancy: management from preconception to the postnatal period | Guidance | NICE](#)

[Real-time continuous glucose monitoring - Health Technology Wales](#)

[Formulary Status For Freestyle Libre 2 and Dexcom One 5531.pdf](#)

Additionally, the UHB provides a copy of the All Wales Patient Self-Testing Blood Glucose Meters Guidance formulary, at Attachment 1.

The UHB as applied an exemption under Section 43 of the Freedom of Information Act 2000 (FoIA) to the formulary costs, in Attachment 1, as they relate to a third parties and disclosure would be prejudicial to their commercial interests. Section 43(2) exempts information, where disclosure would or would be likely to prejudice the commercial interests of any company.

Commercial interests may be prejudiced where disclosure would, or would be likely to:

- Weaken a company's position in a competitive environment by revealing market sensitive information or information of potential usefulness to its competitors
- Damage a company's business reputation or the confidence that customers/users, suppliers or investors may have in it.

This exemption is qualified; therefore, even if information falls within Section 43, public authorities must then apply the public interest test set out in Section 2(2)(b). The information can only be withheld if the public interest in maintaining the exemption outweighs the public interest in disclosure.

The UHB has therefore considered the following:

**In favour of disclosure:** There is a public interest in transparency and in the accountability of public funds. Furthermore, it is in the public's interest that public funds be used effectively and that public sector bodies obtain the best value for money when contracting for the provision of products and services. Private sector bodies engaging in commercial activities with the public sector must expect some information about those activities to be disclosed.

**Against Disclosure:** Disclosure of this information would have a direct impact and cause substantial harm to the suppliers, as it would disclose their pricing and products/services provided to the UHB, and it would be likely that this would damage their ability to work within a highly competitive sector. The information being requested is likely to be used by their competitors to gain a competitive advantage.

**Decision:** The UHB has considered that releasing the information under the FoIA, to which the UHB is subject, will give an unfair advantage to the suppliers' competitors. The UHB believes that there is wider established public interest in companies not being prejudiced merely because they have contracted with or are bidding to contract with a public sector body, and that there is a public interest in ensuring that there is competition for public sector contracts.

Therefore, the public interest in withholding the formulary costs is greater than the interests in disclosing it and thereby giving unfair commercial advantage to competitors of the company to which this information concerns.

As the formulary contract for CGMs is managed on an All-Wales basis by the Procurement Services in NHS Wales Shared Services Partnership (NWSSP), we recommend that you contact the Freedom of Information team in NWSSP who may be able to assist you further with this is part of your request. Contact details are as follows:

[shared.services@wales.nhs.uk](mailto:shared.services@wales.nhs.uk) or alternatively in writing to: NWSSP, Information Governance Manager, 4-5 Charnwood Court, Heol Billingsley, Parc Nantgarw, Cardiff, CF15 7QZ.

Additionally, the UHB is withholding the personal information relating to third parties, as there is a potential risk of identifying individuals if this was disclosed. This decision has been made as it is not within the reasonable expectations of these individuals that their personal data would be released into the public domain by the UHB, redactions have been applied accordingly within Attachment 1.

This information is classed as personal data of a third party. Therefore, it is being withheld in accordance with the exemption set out in section 40(2) of the FoIA, by virtue of section 40(3)(a) of the FoIA, which permits a public authority to withhold personal data other than the requestor's where the disclosure would breach Data Protection principles.

This information is protected by the Data Protection Act 2018 (DPA)/UK General Data Protection Regulations (UK GDPR), as its disclosure would constitute unfair and unlawful processing and would be contrary to the principles and articles of the UK GDPR. This exemption is absolute and therefore, there is no requirement to apply the public interest test.

In reaching this decision, the DPA and UK GDPR define personal data as data that relates to a living individual who can be identified solely from that data or from that data and other information, which is in the possession of the data controller.