

Reference:	FOI.17925 & 17926.25
Subject:	Continence and Stoma Care
Date of Request:	29 July 2025

Requested:

FOI.17925

1. Does your organisation have an active Ostomy (stoma) or Continence Care Formulary? If so, please share copies of both formularies, including the full list of products?
2. What NHS organisations are they applicable to?
3. When was the formulary start date, and when will it end or is expected to be renewed?
4. What is the primary objective of the formulary? If this is to deliver cost/improvement/savings, please quantify what savings the formulary has delivered to your organisation each year since it was active?
5. Which part of your organisation benefits from any Formulary savings?
6. What is the process for renewal?
7. Where new, innovative products are launched while the formulary is live, what is the process for reviewing these and adding to the formulary?
8. Other than cost, how are outcomes measured and which outcomes are measured when assessing the effectiveness of the formulary?
9. Are stoma bags included within your formularies?
10. Who are the lead clinical stakeholder(s) responsible for the formularies – name and job role please?
11. Who are the lead nonclinical stakeholder(s) responsible for the formularies – name and job role please?
12. How is formulary compliance measured by healthcare professionals in your organisation?

FOI.17926

1. Do you have Continence and/or Stoma sponsorship agreement (or agreements) in place across your Trusts' different hospital sites? If your hospital sites have different agreements please answer the below questions separately.
2. We appreciate some agreements span Acute, Community, Mental Health and Primary Care Service providers. Which NHS organisations and/or hospital sites is this applicable too?
3. When was it launched and when will it be up for renewal?
4. Who is the provider?

5. Across the full contract length, what is the value?
6. Can you share the procurement notice?
7. How many nurses were provided? If yes, what band and FTE?
8. Are their honorary contracts provided? If yes, what band and FTE?
9. What other incidentals were included in the tender? Including but not limited to; training, IT, vehicles, grants, travel etc
10. What KPIs are included in the agreement and how is success measured?

Response:

Hywel Dda University Health Board (UHB) has applied an exemption under Section 43 of the Freedom of Information Act 2000 (FoIA) to the following parts of your request:

FOI.17925 – Question 1, formulary costs

FOI.17926 – Question 5, contract value

This information relates to 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 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: Following consideration of the arguments, the UHB determines that the costing information detailed within Attachments 1 to 6 is commercially confidential in nature, as its use could impact the provider's ability to trade within a competitive market and equally could impact the UHB's ability to procure the items required treat its patients.

Additionally, the UHB has consulted with the third party provider, Eakin Healthcare, and following consideration of their comments, have decided that releasing the contract value requested under question 5 of FOI.17926, will give an unfair advantage to the provider's competitors. The UHB believes that there is wider established public interest in companies not being prejudiced merely because they have contracted with a public sector body, and that there is a public interest in ensuring that there is competition for public sector contracts.

The UHB considers that the public interest in withholding the costs is greater than the interest in disclosing it, as it is anticipated that disclosure of the information would be likely to give unfair commercial advantage to competitors of the companies concerned.

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 and provides the information it holds below.

FOI.17925

1. The UHB confirms that it does have Stoma and Continence Care Formularies. The Continence Formulary sits within the Cobweb Catheter Formulary. Copies of the current Formularies and product selection guides have been provided at the following attachments:

- Attachment 1 - Stoma Care Guidance and Accessories Formulary (currently under review)
- Attachment 2 – Adult Continence and Urology Formulary 2022/23
- Attachment 3 - Community product selection guide
- Attachment 4 - Hospital product selection guide
- Attachment 5 – Children's product selection guide
- Attachment 6 - Special Order Items product selection guide

An exemption under Section 43 has been applied to the redacted costs within Attachments 1-6.

2. The Stoma Formulary applies to the UHB's Colorectal/Stoma Clinical Nurse Specialist (CNS) team, and the Cobweb Formulary applies to the BABAS team.

3. The UHB confirms that the most recent start date identified for the Stoma Formulary was September 2014. A review was started in 2022, however, it was not fully completed. The formulary is currently under review.

The Cobweb Catheter Formulary start date was April 2023 and is scheduled for renewal before 1 March 2026.

4. The UHB provides the primary objectives of the formularies below:
 - Regular patient reviews
 - Prevent overuse of products
 - Provide products that assist the delivery of safe care for patients in accordance with National Institute for Health and Care Excellence (NICE) guidance and British Standard compliance
 - Deliver equitable standardised high-quality care for patients
 - Patient prescriptions are modified (i.e. off formulary) to support individual clinical need.
5. Not applicable.
6. For the Stoma Formulary, the Medicines Management and the Stoma CNS teams work collaboratively to review accessory products and choose from a variety of products on the market, to meet patient needs.

The Continence and Urology Formulary covers more than one (1) area and therefore requires additional input from wider teams. The most recent renewal process, undertaken during the 2022 and 2023 calendar years was led CNS'. The renewal process was as follows:

- Questionnaires sent to Urology CNS, BABAS CNS and the administration teams requesting feedback on the following, as appropriate to professional roles:
 - Any issues with products
 - Patients' feedback on products good and bad
 - Products used and rationale for use
 - Any issues with stock, supply or delivery of products
 - Suggestions of products for addition to formulary
- The CNS attended the Association for Continence Advice (ACA) meeting to view the many products available and arranged meetings with various companies to gain an understanding of their products.
- The previous formulary was used to inform the process and they met periodically to discuss the formulary and progress the work.
- BABAS/Cobweb team members identified any issues with products i.e. stock levels, product problems, reports or complaints from patients about products.
- Progress update provided to the Band 7 CNS, and a first draft was circulated for comment to BABAS and Cobweb administration teams on 1 December 2022.
- Amendments were made to the draft due to a product being discontinued and queries with regards to codes.
- The final version was agreed on 17 April 2023.
- Following receipt of feedback from Urology in June 2023 the formulary was further amended and finalised.

The next review will also include:

- Small (informal) trials conducted with patients, where appropriate, and the collection of feedback.
- Cross referencing to All Wales Continence Forum (AWCF), the national stakeholder group
- Interrogation of costs.

7. The UHB does not hold all of the information requested as its Stoma Formulary is currently under its first review and the team does not currently have a process for considering the addition of new products to the existing formulary.

However, the UHB provides below the process for reviewing and adding new products to its Contenance and Urology Formulary:

- Small informal trials carried out with patients
- Depending on feedback/outcomes, the products are considered for inclusion in an updated formulary
- Benchmark use of products via AWCF
- Discussion and agreement within the BABAS team, price comparison via drug tariff, discussion with relevant services.

8. The UHB confirms that outcomes are measured by products that are deemed fit for purpose, patient feedback, complaints and the percentage of formulary compliance.

Additionally, as part of BABAS overall workplan, an annual audit of patient satisfaction of prescribed formulary products is being designed, with implementation scheduled for Autumn 2025.

9. No, stoma bags are not included in the formularies.

10. The UHB provides below the names of the clinical leads with responsibility for the formularies:

Stoma Formulary

Nerys Thomas, Colorectal/Stoma CNS

Contenance and Urology Formulary

Janine Dailey, Lead Nurse - Bladder, Bowel, Pelvic Health Advisory Service

11. The UHB provides below the names of the non-clinical leads with responsibility for the formularies:

Stoma Formulary

Gina Williams, Pharmacy and Medicines Management Service Manager.

Contenance and Urology Formulary

Peter Skitt, Clinical Care Group Service Director - Community & Integrated Medicine.

Sian John, Senior Procurement Business Manager, NHS Wales Shared Partnership (NWSSP).

12. Formulary compliance is measured by regularly monitoring and reviewing orders recorded on the prescription system.

FOI.17926

1. The UHB confirms that it has an All-Wales Framework agreement for the provision of Stoma Care Support Services, procured by NWSSP.

2. The UHB confirms that the agreement covers all UHB hospital sites as well as the community, with Stoma nurses covering both Primary and Secondary Care.
3. The agreement commenced 1 April 2025, on a three (3) year contract with the option of a two (2) year extension.
4. The provider is Eakin Healthcare.
5. An exemption under Section 43 has been applied.
6. The UHB does not hold the requested information as the procurement notice was issued by the Procurement Team in NWSSP. We therefore recommend that you redirect this part of your request to the Freedom of Information Team in NWSSP, who should be able to help you with your enquiry. Contact details are as follows:

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.
7. The UHB confirms that a Whole Time Equivalent (WTE) of 3.0 nurses were provided as part of this agreement, with an additional 2.0 WTE for support staff.
8. The UHB confirms that there are no honorary contracts.
9. The UHB provides a list of the incidentals included in the agreement below:
 - IT equipment, including mobile phones and laptops
 - Education
 - Travel
10. The UHB confirms that regular audits are undertaken to monitor the quality and effectiveness of the service and products. Additionally, the UHB provides below a list of the Key Performance Indicator (KPI's) that are included in the agreement:
 - Complaint resolution
 - Health Board complaints
 - Patient complaints
 - Portal uptime
 - Ordering system uptime
 - Product shipped versus prescribed items
 - Delivery time and quantity versus requested
 - Delivery time and quantity versus confirmed
 - Prescriptions changed without NHS Wales CNS agreement
 - Samples sent without CNS agreement
 - Correctly completed patient registrations