

Reference:	FOI.18674.25
Subject:	Pembrolizumab
Date of Request:	23 October 2025

Requested:

I request the following information concerning the cancer medicine pembrolizumab (brand name Keytruda).

1. For each of the past 10 financial years (2014/15 to 2023/24, or the most recent 10-year period available), please provide the number of individual patients treated with Pembrolizumab. If it is not possible to provide this information, please explain why.
2. For each of the six patients who were/have been on Pembrolizumab for the longest, what has it cost the NHS per patient? If it is not possible to provide this information, please explain why.
3. For each of the past 5 financial years (2019/20 to 2023/24, or the most recent 5-year period available), how many legal challenges or complaints have you had regarding Pembrolizumab and what was the nature of each of these? If it is not possible to provide this information, please explain why.
4. For each of the past 10 financial years (2019/20 to 2023/24, or the most recent 10-year period available), how many adverse events, and separately, serious adverse events, have you had which reference Pembrolizumab? If it is not possible to provide this information, please explain why.

Response:

Hywel Dda University Health Board (UHB) is unable to provide you with the information requested for question 3, as it is estimated that the cost of answering your request would exceed the “appropriate limit” as stated in the Freedom of Information Act 2000 (Appropriate Limit and Fees) Regulations 2004. The “appropriate limit” represents the estimated cost of one person spending 18 hours (or 2 ½ working days) in determining whether the UHB holds the information, and locating, retrieving and extracting the information.

As medication is not a searchable field, the UHB would need to undertake a manual search of all complaints recorded on its Datix incident and risk reporting system for the five (5) year period requested, to identify any information relating to Pembrolizumab, which may fulfil this part of your request as it is not recorded centrally.

The UHB can confirm that for the 2024 calendar year (the most recent full year available) two thousand, two hundred and eight (2,208) complaints were recorded. It is estimated that a manual search of these records would exceed the 18 hours stipulated within the Freedom of Information Act 2000 (FoIA). Based on the number of records identified for the 2024 calendar year, conducting a search of digital records taking a minimum of five (5) minutes per digital record, would far exceed the ‘appropriate limit’, costing the UHB the following:

2,208 @ 5 minutes per record = 183 hours and 55 minutes
 183 hours and 55 minutes @ £25 per hour = £4,598.00

The UHB is therefore applying an exemption under Section 12 of the FoIA, which provides an exemption from a public authority's obligation to comply with a request for information where the cost of compliance is estimated to exceed the appropriate limit.

However, under Section 16 of the FoIA, we are required as a public authority, to provide advice and assistance so far as it is reasonable to individuals who have made a request under the FoIA, this can include assisting a requestor to further refine their request.

Unfortunately, the UHB is unable to provide advice on how you can refine your request for question 3. This is due to the UHB still requiring a manual trawl of complaints to be undertaken to identify any of the information requested.

1. The UHB provides within the table overleaf, the number of patients treated with Pembrolizumab as recorded across the two (2) pharmacy systems, Electronic Data System (EDS) and WellSky, during the 2015/2016 to 2024/25 financial years.

Financial year	Number
2015/16	0
2016/17	4
2017/18	15
2018/19	55
2019/20	79
2020/21	87
2021/22	129
2022/23	162
2023/24	187
2024/25	202

Please note: the EDS pharmacy stock control system (used to record the data for the 2015/16 to 2020/21 financial years) booked out some medication as stock rather than direct to patients. The UHB has reported the information for issues direct to patients for these financial years, which may not include all patients.

2. The UHB provides within the table below, the costs for the six (6) patients that have received Pembrolizumab for the longest period of time.

Number	Cost
1	£30,601.49
2	£55,200.65
3	£67,759.82
4	£115,703.48
5	£122,162.48
6	£134,678.74

3. An exemption under Section 12 has been applied.
4. The UHB confirms that it has undertaken a search of its two (2) Datix incident and risk reporting systems covering ten (10) financial years from 2015/16 to 2024/25, and no adverse events or serious adverse events relating to Pembrolizumab have been recorded.