

Reference:	FOI.709.19
Subject:	Hywel Dda University Health board (UHB) Prior Approval Policy
Date of Request:	10 May 2019

Requested

1. Equality impact assessments

Could you please provide:

- a) Copies of any equality impact assessments or other equality assessments undertaken in relation to the NHS Wales Prior Approval Policy, including:
 - i. before it was approved.
 - ii. after it was approved (including assessments relating to its implementation, monitoring and review).
- b) Copies of any other documents produced pursuant to Hywel Dda meeting its duties under the Equality Act in relation to the prior approval policy and/ or out of area referrals.

2. Implementation plans etc.

Could you please provide:

- a) Copies of any strategies, plans, guidance and similar for the implementation, monitoring and/or review of the NHS Wales Prior Approval Policy.
- b) Copies of any strategies, plans, guidance, or other documents, aimed in part or whole at attempting to ensure that the NHS Wales Prior Approval Policy is itself and/or is implemented in a way which is lawful, fair, effective, efficient and/or non-discriminatory.

3. Requests for review and complaints

- a) Neuro-ophthalmology (and not just ophthalmology and neurology)
- b) Polymerase III blood tests and autoimmune related blood tests more generally
- c) Nailfold capillaroscopy
- d) RNHRD (Royal National Hospital for Rheumatic Diseases)
- e) Rheumatology
- f) ENT
- g) Diagnostic tests and/or diagnosis related opinions at any UK autoimmune centres of excellence

For the three years covered in my previous request i.e. the three years preceding that request, could you please provide the following data in relation to each of the above listed areas.

- a) How many of the “Not Approved (rejected and not later accepted)” requests (in each of the above areas) led to a request for information, about how the decision was reached, from:
 - i. The patient
 - ii. Their clinician.
 - iii. The patient with their clinician

b) How many of the “Not Approved (rejected and not later accepted)” requests (in each of the above areas) led to a request that the decision (not to refer) be reviewed. How many of any such requests came from?

- i. The patient
- ii. Their clinician
- iii. The patient with their clinician.

c) How many of the “Not Approved (rejected and not later accepted)” requests (in each of the above areas) led to a complaint from:

- i. The patient
- ii. Their clinician
- iii. The patient with their clinician.

Response:

1. The UHB has provided a copy of the Summary Equality Impact Assessment (Attachment 1) completed in support of the NHS Wales Prior Approval Policy. The decision to review the Individual Patient Funding Request (IPFR) process utilised by NHS Wales Health Boards was made by Welsh Government.

The UHB is withholding the names of the members of staff responsible for the Summary Equality Impact Assessment. This decision has been made as it is not within the expectations of these individuals that their personal data would be put into the public domain. This information is classed as personal data of third parties and is therefore being withheld in accordance with section 40 (2) of the FOI by virtue of section 40 (3) (a) (i) which permits a public authority to withhold personal data other than the requester’s where the disclosure would breach a Data Protection Principle.

The Data Protection Act (DPA) / General Data Protection Regulation (GDPR) defines personal data as data which 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.

Further information relating to the review can be found via the following links.

<https://gov.wales/written-statement-individual-patient-funding-request-ipfr-process-next-steps>

<https://gov.wales/written-statement-independent-review-individual-patient-funding-request-ipfr-process>

<http://www.wales.nhs.uk/sitesplus/documents/866/NHS%20Wales%20IPFR%20Policy%20-%20June%202017%20-%20Final.pdf>

[http://www.assembly.wales/ministerial%20statements%20documents/individual%20patient%20funding%20request%20\(ipfr\)%20review/181010%20-%20vg%20-%20written%20statement%20-%20individual%20patient%20funding%20request%20\(ipfr\)%20review%20-%20english.docx](http://www.assembly.wales/ministerial%20statements%20documents/individual%20patient%20funding%20request%20(ipfr)%20review/181010%20-%20vg%20-%20written%20statement%20-%20individual%20patient%20funding%20request%20(ipfr)%20review%20-%20english.docx)

2. The UHB does not hold any implementation plans, strategies or guidance which were used to introduce the new policy.

3. a) The UHB did not receive any requests for information on how the decision not to approve an application was reached.
- b) The UHB did not receive any requests to review "Not Approved" decisions.
- c) The UHB did not receive any complaints following a "Not Approved" decision.