



9 August 2018

## FREEDOM OF INFORMATION – DECISION NOTICE

Dear Requester

### FOI Reference Number: 18377

I refer to your email of 18 July requesting information in respect of transdermal patches.

I can confirm on behalf of Great Yarmouth and Waveney, North Norfolk, South Norfolk, Norwich and West Norfolk CCGs and in accordance with S.1 (1) of the Freedom of Information Act 2000 (FOIA) that we do hold the information that you have requested. A response to each element of your request is detailed below:

1. Please identify and state the name of any formulary group that your CCG was part of in 2016? This may include one or more of: a joint formulary committee, area formulary committee or equivalent formulary.

All Norfolk CCGs are members of the Therapeutic Advisory Group (TAG).

[https://www.knowledgeanglia.nhs.uk/kms/Norwich/Home/Prescribing,PharmacyandMedicinesOptimisation/TherapeuticAdvisoryGroup\(TAG\)/AboutTAG.aspx](https://www.knowledgeanglia.nhs.uk/kms/Norwich/Home/Prescribing,PharmacyandMedicinesOptimisation/TherapeuticAdvisoryGroup(TAG)/AboutTAG.aspx)

A subgroup of this is the prescribing reference group which deals with issues that are mostly primary care, or which may have less of a budgetary impact, and formularies.

2. On what date was Qdem's 7-day buprenorphine transdermal patch with the product name Butec submitted to any formulary group identified in question "1" above for consideration and approval as to whether it should be included on the respective drug formulary?

Butec was agreed at a meeting of the prescribing reference group on the 7th April 2016.

3. Where Butec has been added to your CCG's drugs formulary or another formulary identified in question "1", please provide any minutes that evidence what decisions were made in relation to whether to approve or reject Butec's application. We are seeking minutes of meetings or any other written record held by each CCG recording the approval of Butec on to any formulary indicated in Question 1 above that each CCGs participates in. Any decision would have been made from 1 January 2016 onwards.

The decision was recorded under Scriptswitch changes, below is the relevant extract from the minutes:

***“Buprenorphine Patches to Butec 10% savings possible. Members agreed to add to scriptswitch. North Norfolk will be trying to reduce the prescribing of all patches”***

4. On what date was Butec first added to your CCG’s drug formulary (adopting the relevant formulary identities listed above)?

The formulary does not list branded generics; the listing is for buprenorphine patches. It was added as a low cost patch in April 2016. A copy of the analgesic formulary is attached

5. Assuming the response to question “3” is positive, has any other branded generic 7-day buprenorphine transdermal patch subsequently been added, or replaced Butec on your CCG’s drug formulary? Please indicate the date on which this occurred. If the answer to this question is positive, please provide any minutes that evidence what decisions were made in relation to whether to approve or reject an subsequent supplier’s branded generic 7-day Buprenorphine transdermal patch application. We are seeking minutes of meetings or any other written record held by each CCG recording the approval of any other branded generic 7-day Buprenorphine transdermal patch on to each CCGs formulary. Any decision would have been made from 1 January 2016 onwards.

All low cost options are allowed. The CCGs do not hold any minutes.

6. Please provide a copy of any guidance your CCG possessed in 2016 that established the process by which a new drug would be considered for addition to your CCG’s drug formulary (again, adopting the relevant formulary identities listed in question “1”).

Please see the attached medicines policy, also available on-line [http://www.westnorfolkccg.nhs.uk/sites/default/files/New%20Medicines%20Policy%20\(March%202014\).pdf](http://www.westnorfolkccg.nhs.uk/sites/default/files/New%20Medicines%20Policy%20(March%202014).pdf)

Please note generic alternatives, including branded generics are not regarded as new drugs.

7. Please provide any other minutes recorded by your CCG that evidence what decisions were made by your CCG’s medicines management committee or other equivalent committee at CCG level to select a preferred branded generic 7-day Buprenorphine transdermal patch. We are seeking minutes of meetings or any other written record held by each CCG recording the decision to select a branded generic 7-day Buprenorphine transdermal patch. From the response to the Freedom of Information request you attached, NHS North Norfolk, NHS South Norfolk, NHS West Norfolk and NHS Norwich indicated that the decision was made in April 2016. No date was given in Great Yarmouth & Waveney CCG’s response to a Freedom of Information identical to that which you attached.

The CCGs do not hold any minutes as requested however we have identified an email trail dated 12 September 2016 discussing the inclusion of patches. A copy of the redacted email is attached. The personal data of identifiable individuals has been redacted pursuant to section 40 of the FOIA. Section 40 is an absolute exemption which exempts the disclosure of personal information which would lead to the identification of individuals, thus breaching Section 24(1) of the Data Protection Act 2018 and Article 21 of the General Data Protection Regulation.

I hope that this answers your queries with the information we currently hold, but if I can be of any further assistance please do not hesitate to contact me.

If you are dissatisfied with the handling of your request, you have the right to ask for an internal review. Internal review requests should be submitted within two months of the date of receipt of the response to your original letter and should be addressed to

Arden & GEM CSU  
FOI Team, Room 18  
Scarsdale  
Newbold Road  
Chesterfield  
S41 7PF

Email [agcus.foi.norfolkwaveneyccgs@nhs.net](mailto:agcus.foi.norfolkwaveneyccgs@nhs.net)

If you are not content with the outcome of your complaint, you may apply directly to the Information Commissioner for a decision. Generally, the ICO cannot make a decision unless you have exhausted the complaints procedure provided the CCG.

The Information Commissioner can be contacted at: Information Commissioners Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF, telephone 0303 123 1113, email [casework@ico.org.uk](mailto:casework@ico.org.uk)

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Yours faithfully

Philip Humphreys

**FOI Manager, Arden & GEM CSU**

**On behalf of  
Great Yarmouth and Waveney,  
North Norfolk, South Norfolk  
Norwich and West Norfolk CCGs**