

**DOCUMENT TITLE: Delivering Value Through Disinvestment: an exploration and analysis of appropriate disinvestment in medicines considered low value for funding by NHS Wales****CLOSING DATE: Friday 28 August 2020**

Please complete your personal details along with the Consultation Pro-forma **and** the Declaration of Interests form below. Please type directly into the forms and save with your initials (or other appropriate identifier) before returning to awttc@wales.nhs.uk.

Name	Martin FIDLER JONES
Organisation/Company	Tenovus Cancer Care

CONSULTATION PRO-FORMA

Page number/section number/ line number	Comment
Pg. 3/ line 28 Pg. 5/line 128-129 Pg. 10/ line 348-349	We would welcome attempts to drive down variability and increase resource allocation to focus on the most effective options.
Pg. 5/lines 143-146	<p>We would always exercise caution if decisions are made on modelling at a population level as this can potentially a) lose the individuality that some treatments might offer and b) can bias against rarer cancers where the incidence numbers lack sufficient power.</p> <p>However we note that there is a recognition of this in the consultation and make attempts to reconcile this though, particularly when suggesting certain treatment options should be kept on the table in specific conditions for specific patients (Pg. 4 line 97/98. Pg. 6 line 240-242. And particularly Pg. 8 line 278-290 and Pg. 11 line 419-421.</p>
Pg. 3/4	<p>When considering the cost-effectiveness of a drug you will always have a powerful case study which shows how the decisions made have had a detrimental impact on someone or a situation. These then tend to attract headlines.</p> <p>A co-developmental approach which includes a broad spectrum of stakeholders, goes a long way in ensuring the process is felt to be fair and transparent which will help to some extent.</p>
Pg. 5/ line 132-133	We note the change in terminology used and that such changes may have an effect, positive or negative, on the normative discourse surrounding the subject. Being clear and transparent regarding the rationale for such a change is essential.
Pg. 6 /line 178-179	We endorse the idea to produce process/template for future assessments of LVP as assisting in transparency. However it is important to retain the capacity to place these decisions within a wider context and to recognise specific conditions.
Pg. 6 /line 216-220	The approach identified from the literature review is noteworthy and should provide a clear platform for decision making. This may also help mitigate some of the risks identified above.
Pg.7	The lack of evidence of the outcomes of disinvestment activities is concerning. We hope this process will make an important contribution to closing this knowledge gap.

DECLARATION OF INTERESTS

Do you have any business or personal interests that might be material and relevant to the project/document under consideration?

Yes	X
No	

If **yes**, please give details below:

Prof Deborah Fitzsimmons is a Trustee with Tenovus Cancer Care.