



Reference: FOI.ICB-2526/447

Subject: Liothyronine Audit (2021)

I can confirm that the ICB does hold some of the information requested; please see responses below:

QUESTION	RESPONSE
<p>I am seeking information relating to the audit of patients prescribed liothyronine undertaken by NHS Bristol, North Somerset and South Gloucestershire CCG in 2021, as evidenced by the email circulated by the Principal Medicines Optimisation Pharmacist on 21 June 2021 requesting patient-level data from GP practices.</p> <div style="display: flex; justify-content: space-around; align-items: center;">   </div> <p>Email attachment - Email - Liothyronine Liothyronine feedbaprescribing in prima</p>	
<p>1. Legal basis for processing identifiable patient data</p> <p>1.1. The specific legal basis relied upon under the Data Protection Act 2018 / UK GDPR for the collection and processing of potentially identifiable patient-level data for this audit.</p> <p>1.2. Whether the audit was conducted under a Section 251 approval (NHS Act 2006) or COPI Regulations, and if so, please provide:</p> <ul style="list-style-type: none"> • the CAG reference number • the approval documentation • the scope of the approval 	<p>Not applicable as the data is not classified as personal data.</p>

<p>1.3. If no Section 251 approval existed, please provide the specific statutory or regulatory basis relied upon for the extraction and processing of identifiable patient-level data. For the avoidance of doubt, please specify:</p> <ul style="list-style-type: none"> • the exact statutory provision(s) under the NHS Act 2006, Health and Social Care Act 2012, or any other legislation relied upon; • the specific UK GDPR Article 6 lawful basis and Article 9 condition relied upon; • any supporting regulations, directions, or statutory instruments e.g. NHSE policy • any internal or external legal advice confirming that this basis was sufficient for the extraction of identifiable patient data from GP practices. <p>Please note that general references to “public task”, “commissioning duties”, “public interest”, or “public duty” will not answer this question unless accompanied by the specific statutory powers and legal provisions that were relied upon</p>	
<p>2. Governance and authorisation</p> <p>2.1. The Data Protection Impact Assessment (DPIA) completed for this audit.</p> <p>2.2. Any Information Governance (IG) approval, Caldicott Guardian approval, or internal governance sign-off authorising the extraction of identifiable patient data.</p> <p>2.3. Any risk assessments, IG reviews, or data-minimisation assessments undertaken prior to the audit.</p>	<p>2.1 DPIA is not held as no DPIA was completed as this activity was not considered high risk.</p> <p>2.2 No personal data was shared with the CCG and so no sign off required</p> <p>2.3 Adequate relevant and limited information was requested to comply with minimisation requirements.</p>

<p>3. Purpose and scope of the audit</p> <p>3.1. The stated purpose of the audit, including any documents describing:</p> <ul style="list-style-type: none"> the objectives the intended outcomes how the data would be used how long the data would be retained <p>3.2. Any documents linking the audit to:</p> <ul style="list-style-type: none"> NHSE policy RMOC guidance Low Value Medicines work commissioning decisions deprescribing initiatives 	<p>3.1 This work was to review the prescribing of the liothyronine medication to ascertain if this was prescribed in line with national guidance to support patient safety and quality of prescribing. It also helps to understand whether patient reviews and appropriate monitoring was happening.</p> <p>3.2 Information available is as follows:</p> <ul style="list-style-type: none"> Previous guidance from Regional Medicine Optimisation Committee (RMOC) which was available via the following website but has since been removed: Regional Medicine Optimisation Committee guidance- Prescribing of liothyronine NHS England, guidance on Items which should not routinely prescribed in primary care: NHS England » Items which should not routinely be prescribed in primary care: policy guidance BNSSG Joint Formulary guidance and can be accessed via: https://remedy.bnssgccg.nhs.uk/formulary-adult/chapters/6-endocrine-system/69-thyroid-disorders/ 2023 NHS England Liothyronine guidance NHS England » Liothyronine – advice for prescribers NICE Guidance, Thyroid disease: assessment and management, NG145 (originally published November 2019, updated October 2023) https://www.nice.org.uk/guidance/ng145
<p>4. Communications and instructions</p> <p>4.1. All internal communications (emails, memos, meeting notes) relating to:</p> <ul style="list-style-type: none"> the decision to undertake the audit instructions to GP practices discussions about the legal basis 	<p>4.1 This information is not held.</p> <p>4.2 Communication information is not held, the only information held is the email communication included in the FOI request.</p>

<ul style="list-style-type: none"> concerns raised about data protection or IG compliance <p>4.2. Any communications with GP practices explaining:</p> <ul style="list-style-type: none"> why the data was required whether practices were obliged to provide it whether patient consent was required 	
<p>5. Policies in force at the time</p> <p>5.1. Copies of all BNSSG CCG policies in force in 2021 relating to:</p> <ul style="list-style-type: none"> medicines optimisation audits data extraction from GP practices processing of identifiable patient data for commissioning purposes liothyronine prescribing 	<ul style="list-style-type: none"> No specific Medicines optimisation audit policy held No data extraction policy held by the CCG as no extraction of personal data No specific policy regarding processing identifiable data, however ICB guidance can be found in the following documents; Information Governance Policy and Information Governance Management Framework: Information Governance Policy - ICB and Information Governance Management Framework The RMOC and 2023 NHS England guidance have been treated as guidance not as a commissioning policy. We do not hold a commissioning or prescribing policy for liothyronine.

The information provided in this response is accurate as of 9 April 2026 and has been approved for release by Dr Joanne Medhurst, Chief Population Health Improvement Officer for NHS Bristol, North Somerset and South Gloucestershire ICB.