

Reference: FOI.ICB-2627/195

Subject: Rebate, Discount or Other Financial Incentive Schemes with Abbott Group

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

QUESTION	RESPONSE
1. Please confirm if Bristol, North Somerset and South Gloucestershire ICB is currently a participant in any rebate, discount or other financial incentive schemes with Abbott Laboratories Limited, Abbott Diabetes Care Limited, Abbott Diabetes Care, Inc, or any other member of the Abbott group, pertaining to: a) FreeStyle Libre 2, FreeStyle Libre 3, FreeStyle Libre 2 Plus, or FreeStyle Libre 3 Plus products; and/or b) Products for the management of diabetes which include, among other products, the products listed at (i) above; and/or c) Products sold by the Abbott group (i.e. not limited only to the management of diabetes) including, among other products, the products listed at (i) above.	a) The ICB currently has a rebate for FreeStyle Libre 2 plus b) Yes – as above c) The ICB does not currently have any other rebate, discount or other financial incentive schemes for other products sold by Abbott Group

2. In respect of each such rebate, discount or other financial incentive scheme above, please confirm:

- a) The Abbott products that the applicable scheme relates to;
- b) The start and end date of the scheme; and
- c) The criteria (e.g. minimum volume, minimum spend) that need to be met in order to trigger each rebate, discount, or other financial incentive within the scheme, and (to the extent Bristol, North Somerset and South Gloucestershire ICB is able to provide such information) the corresponding financial value of each applicable rebate, discount, or other financial incentive.

- a) Freestyle Libre 2 Plus
- b) Start date 01/09/2022 and end date 30/06/2027
- c) The ICB has contacted the contract holder involved previously who have confirmed that they believe this information is confidential and commercially sensitive and provided their reasoning. The ICB has considered this information when applying the public interest test to the exemptions.

The ICB has applied Section 41 (Information provided in confidence) to this part of the response. The contract holder has confirmed that the information was shared with the express understanding that the information was confidential and this was outlined in the agreement signed by the ICB. Therefore disclosure of the information would be considered a breach of confidence actionable by the contract holder. Section 41 is an absolute exemption which does not require a public interest test, however the ICB has considered whether the public interest would outweigh maintaining confidentiality, including the consideration of the public interest test applied regarding Section 43(2) below. In this instance there was no wider public interest in disclosing the confidential information.

The ICB has also applied Section 43(2) (Information prejudice to commercial interests) to the response. The public interest arguments in favour of disclosing the information include the ICB's responsibility to be transparent and accountable in its decision making. The ICB policy for Sponsorship of Activities by and Joint Working with the Pharmaceutical Industry outlines the values the

	ICB adheres to when working with the pharmaceutical industry and this includes the principle for the ICB to promote confidence between staff, patients and the public through transparency of NHS activities. The policy also outlines that information relating to rebate schemes is disclosable under the FOI Act and only information considered commercially sensitive should be redacted. The public interest arguments in favour of maintaining the exemption includes the agreement signed by the ICB which confirms the information as commercially sensitive and the subsequent confirmation of this from the contract holder as well as their reasoning for why they consider the information commercially sensitive. Rebate schemes allow organisations to offer a financial rebate to the ICB and these schemes are considered on clinical, financial and contractual grounds and will only be considered if the medicines are appropriate and of value to the ICB population. The ICB has considered that disclosure of the information may lead to the contract holder not offering this type of scheme again which may result in the ICB having to spend more public funds on prescribing. The ICB has a responsibility to secure the best use of public resources and provide value for money. The ICB has considered the balance of both disclosing the information and maintaining the exemption and believes that it is in the public's best interest to apply the exemption. The ability for organisations to offer rebate schemes to the ICB reduces the amount of public funding used for prescribing and allows for the more effective use of resources to ensure that the ICB achieves value for money.
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	The policy which holds information around how the ICB reviews rebates and is our primary care rebate policy can be found here: https://bnssg.icb.nhs.uk/library/policy-sponsorship-activities-and-jointworking-pharmaceutical-industry/
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The information provided in this response is accurate as of 29 September 2026 and has been approved for release by Dr Ananthakrishnan Raghuram, Chief Clinical Leadership and Service Delivery Officer for NHS Bristol, North Somerset and South Gloucestershire ICB.