

12/02/2026

NN-ICB/26-1467

Dear Requestor

Re: Freedom of Information Request

Thank you for your request for information, received on 15 January 2026, regarding funding mechanisms, contractual arrangements and provider payment for medical retina (anti-VEGF) drugs. We have processed your request in accordance with the Freedom of Information Act 2000 (FOIA).

Under the FOIA, public authorities like ours are required to respond to requests for information within 20 working days. In response to your request, I can confirm that we partially hold the information requested. However, please note that some of the information you requested has been withheld. Under the FOIA, certain exemptions may apply to protect sensitive information.

Please find below our response to your request:

I am requesting information regarding the financial flows and contractual arrangements between the ICB and its commissioned NHS Trusts for the provision of medical retina services, specifically concerning anti-VEGF (Vascular Endothelial Growth Factor) medicines - Aflibercept, Ranibizumab, Faricimab, Bevacizumab, Brolucizumab.

Please provide answers to the following questions for each NHS Trust provider of Medical Retina services that the ICB commissions.

1. Contractual Structure

- Are anti-VEGF drug costs currently reimbursed to the Trust via:
 - a) A **pass-through** mechanism (cost-and volume)?
 - b) A **fixed block contract** (inclusive of drug spend)?
 - c) An **Aligned Incentive Contract (AIC)** or "Blended Payment" model?
- If a blended/AIC model is used, what is the specific split between the fixed element and the variable (volume-based) element for high-cost anti-VEGF drugs?

Name of Trust:	How are anti-VEGF drug costs currently reimbursed to the Trust:
Nottingham University Hospitals NHS Trust	Via a pass-through mechanism
Sherwood Forest Hospitals NHS Foundation Trust	Via a pass-through mechanism
Doncaster and Bassetlaw Teaching Hospital NHS Foundation Trust	Via a pass-through mechanism

2. Efficiency and Savings Incentives

- Is there a formal **Gain-Share Agreement** in place between the ICB and the Trust regarding the use of biosimilar anti-VEGF agents?
- If yes, what percentage of the saving is retained by the Trust vs. the ICB, is there a percentage of the saving is retained by the Trust, and is the gainshare for new patients only?

Name of Trust	Formal Gain-Share Agreement in place?	What is the percentage of the saving retained by the Trust?	Is the gainshare for new patients only?
Nottingham University Hospitals NHS Trust	Yes	*Section 43(2) exemption	No
Sherwood Forest Hospitals NHS Foundation Trust	Yes	*Section 43(2) exemption	No
Doncaster and Bassetlaw Teaching Hospital NHS Foundation Trust	Currently being transacted	Currently being transacted	Currently being transacted

*Section 43(2) exemption

The ICB is unable to share this information as it is deemed commercially sensitive under Section 43 (2) of the Act.

Section 43 of the Act states that:

- (1) Information is exempt information if it constitutes a trade secret.
- (2) Information is exempt information if its disclosure under this Act would, or would be likely to, prejudice the commercial interests of any person (including the public authority holding it).
- (3) The duty to confirm or deny does not arise if, or to the extent that, compliance with section 1(1)(a) would, or would be likely to, prejudice the interests mentioned in subsection (2).

A **public interest test** has been undertaken in response to your request made under the Freedom of Information Act 2000.

The Information Commissioner's Office (ICO) sets out public interest factors in favour of and against disclosure. Some of the factors in favour were as follows:

- Ensuring that the public authority can be held accountable for its decisions, particularly as to how it spends public money.
- Ensuring that a tender process is open and transparent.
- Providing insight into the nature of a procurement process and winning bids, so that other companies are encouraged to take part in the process and improve future bids.

Public interest factors against disclosure (and in favour of the maintenance of an exemption) included:

- There is an inherent public interest in the maintenance of the exemption, and of upholding organisations' expectations that commercially confidential information will be protected from disclosure when they engage in public authority tenders.

- Avoiding the discouragement of prospective tenderers from tendering for public sector contracts, for fear of disclosure of their commercially sensitive information to competitors, and that this may adversely affect both the quality of tenders for public sector contracts, and public authorities' ability to negotiate them effectively.
- Maintaining a competitive market and driving competition as this benefits public authorities and consumers, and which could be threatened by disclosure of companies' commercial information.

On balance of the factors considered above, along with relevant case law, we considered that the ICB would be entitled to withhold the percentage of the formal gainshare saving retained by the Trust and that this would not be superseded by public interest considerations.

3. Funding flows in 2026/27

- Are announced ICB arrangements for merger/cluster/split from April 2026 changing the anti-VEGF funding contractual structure and/or gain-share agreement with the Trust, and if so how?
- What is the NHSE-recommended reference price for anti-VEGF drugs in your region, and is the ICB implementing this reference price with the Trust from April 2026?

Name of Trust	Are announced ICB arrangements for merger/cluster/split from April 2026 changing the anti-VEGF funding contractual structure and/or gain-share agreement with the Trust, and if so how?	What is the NHSE-recommended reference price for anti-VEGF drugs in your region, and is the ICB implementing this reference price with the Trust from April 2026?
Nottingham University Hospitals NHS Trust	The ICB does not hold this information, as this has not yet been decided.	The ICB does not hold this information. However, it may be worth noting that this information is commercial in confidence and NHSE are the information owners.
Sherwood Forest Hospitals NHS Foundation Trust	The ICB does not hold this information, as this has not yet been decided.	The ICB does not hold this information. However, it may be worth noting that this information is commercial in confidence and NHSE are the information owners.
Doncaster and Bassetlaw Teaching Hospital NHS Foundation Trust	The ICB does not hold this information, as this has not yet been decided.	The ICB does not hold this information. However, it may be worth noting that this information is commercial in confidence and NHSE are the information owners.

If you are unhappy with the way in which your request has been handled, NHS Nottingham and Nottinghamshire Integrated Care Board (ICB) has an internal review procedure through which you can raise any concerns you might have. Further details of this procedure can be obtained by contacting Lucy Branson, Director of Corporate Affairs via lucy.branson@nhs.net or by writing to FOI Team at NHS Nottingham and Nottinghamshire ICB, Sir John Robinson House, Sir John Robinson Way, Arnold, Daybrook, Nottingham NG5 6DA.

If you remain dissatisfied with the outcome of the internal review, you can apply to the Information Commissioner's Office (ICO), who will consider whether the organisation has complied with its obligations

under the Act and can require the organisation to remedy any problems. Generally, the ICO cannot make a decision unless you have exhausted the complaints procedure provided by NHS Nottingham and Nottinghamshire ICB. You can find out more about how to do this, and about the Act in general, on the Information Commissioner's Office website at: <https://ico.org.uk/for-the-public/>.

Complaints to the Information Commissioner's Office should be sent to:

FOI/EIR Complaints Resolution, Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. Telephone 0303 123 1113 or report a concern via <https://ico.org.uk/concerns/>.

Yours sincerely

Freedom of Information (FOI) Officer on behalf of NHS Nottingham and Nottinghamshire Integrated Care Board nnicb-nn.foi@nhs.net

All information we have provided is subject to the provisions of the Re-use of Public Sector Information Regulations 2015. Accordingly, if the information has been made available for re-use under the [Open Government Licence](#) (OGL) a request to re-use is not required, but the license conditions must be met. You must not re-use any previously unreleased information without having the consent of NHS Nottingham and Nottinghamshire Integrated Care Board. Should you wish to re-use previously unreleased information then you must make your request in writing (email will suffice) to the FOI Lead via nnicb-nn.foi@nhs.net. All requests for re-use will be responded to within 20 working days of receipt.