

03/07/2026

NN-ICB/26-1651

Dear Requestor

Re: Freedom of Information Request

Thank you for your request for information, received on 9 June 2026, regarding prescribing quality schemes/prescribing incentive schemes. 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 do hold the information requested. However, please note that some of the information you requested has been withheld. Under the FOIA, certain exemptions apply to protect sensitive information.

Please find below our response to your request:

I am enquiring about the details of any prescribing quality scheme/ prescribing incentive scheme you have in place for financial year 2026/27 between your Integrated Care Board and your member GP practices within your area.

Can you please provide the following information if possible:

1. When does the scheme run from and when does it end?

NHS Nottingham and Nottinghamshire ICB has one prescribing incentive scheme in place during the 2026/27 financial year. This scheme supports a switch from Empagliflozin to Dapagliflozin and runs from 1 February 2026 to 31 July 2026.

2. What does the GP practice need to do to achieve as part of the scheme?

Participating GP practices are required to undertake switches from Empagliflozin 10mg to Dapagliflozin 10mg in line with the clinical guidance.

3. What elements are within the scheme – can you be specific about the switches / reviews / medications included?

Further detail on the clinical parameters, inclusion criteria and switching guidance is available via the Nottinghamshire Medicines Optimisation website: [dapagliflozin_switch-clinical_guidance-v1.pdf](#).

4. Which practices have agreed to the scheme?

The ICB confirms that it holds information on which GP practices have agreed to participate in the scheme. However, this information is being withheld under Section 43(2) of the Freedom of Information Act 2000.

Section 43(2) states that information is exempt where its disclosure would, or would be likely to, prejudice the commercial interests of any person, including the public authority holding it.

GP practices operate as independent contractors and their participation in locally commissioned schemes is linked to financial arrangements and service delivery decisions. Disclosure of which individual practices have agreed to participate in this scheme would be likely to prejudice the commercial interests of those practices by revealing information about their prescribing decisions, financial incentives and operational approaches. This could lead to unwarranted comparison between practices, impact their competitive position locally, and influence future commissioning or negotiation processes.

The ICB has undertaken a *public interest test* in respect of this exemption.

In favour of disclosure, there is a clear public interest in transparency, particularly in relation to how public funds are used and how prescribing decisions are supported across primary care. Disclosure would provide greater insight into the operation of the scheme and enable public scrutiny of variation in participation.

In favour of maintaining the exemption, there is a public interest in ensuring that GP practices are able to engage with locally commissioned schemes without concern that commercially sensitive information about their participation will be disclosed. Releasing this information would be likely to undermine trust between the ICB and its member practices, and could discourage full and open participation in future schemes, ultimately impacting the ICB's ability to secure value for money and deliver effective commissioning arrangements.

On balance, the ICB considers that the public interest is better served by maintaining the exemption. The likely prejudice to the commercial interests of GP practices and the ICB is considered to outweigh the benefits of disclosure.

You may also wish to contact individual GP practices directly, as they are separate public authorities for the purposes of the Freedom of Information Act. Any requests for information held solely by those practices would need to be considered by them independently.

5. What the payment is for the practice on achieving each element?

The payment available under the scheme is £60 per successful switch.

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 Governance and Assurance 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.