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WALES

Bwrdd Iechyd Prifysgol  
Cwm Taf Morgannwg  
University Health Board



## Freedom of Information Request: Our Reference CTMUHB\_177\_26

### You asked:

I am writing to request information under the Freedom of Information Act 2000 regarding Commissioning Policy CP43 – Facial Surgery.

Following your previous response (Ref: CTMUHB\_130\_26) indicating that the Equality Impact Assessment (EQIA) for this policy is currently “unlocated,” I would now like to request the clinical, equality, and governance documentation that underpins the current operation of CP43.

Please provide the following information:

### Clinical Evidence Review

1. Any clinical evidence reviews, evidence summaries, or clinical papers used to support the categorisation of procedures under CP43 (for example brow lift, rhinoplasty, or facelift) as “low priority” or “cosmetic,” particularly in relation to patients with gender dysphoria.

### Policy Development Documentation

2. Any documents relating to the development or drafting of CP43, including internal briefing papers, consultation documents, or clinical advisory group recommendations.
3. Policy Approval Documentation
4. Any committee papers, board papers, or decision records relating to the approval or adoption of CP43.

### Policy Review History

5. Records showing when CP43 has been formally reviewed since its introduction, including review dates and any associated reports or outcome summaries.
6. Review Delay Risk Assessment
7. In your previous response you indicated that the scheduled 2025 review of CP43 has been delayed due to clinical pressures. Please provide any risk assessment, equality consideration, or impact analysis conducted in relation to the delay of this review.

## Equality Consideration Records

8. Any equality analysis, briefing notes, or equality considerations undertaken during the development or implementation of CP43, aside from the Equality Impact Assessment previously requested.
9. IPFR "Exceptionality" Guidance
10. Any guidance, framework, or internal documentation used to assess "exceptionality" for Individual Patient Funding Requests relating to facial surgery under CP43.

## Referral Pro Forma Documentation

11. Any documentation relating to the development, validation, or assessment of the referral pro forma used for CP43 referrals.

For clarity, "documentation" includes reports, briefing papers, guidance documents, internal memos, or recorded information held by the organisation.

If any of the requested information is not held, please confirm:

Whether the information may have transferred from the Welsh Health Specialised Services Committee to the NHS Wales Joint Commissioning Committee during the April 2024 restructuring, and

Which organisation currently holds responsibility for maintaining and reviewing Policy CP43.

## Our response:

1. Information not held. The NWJCC commission all Gender Surgery to the NHSE Surgical specification. As such, the Gender Dysphoria surgical pathway is provided via NHSE: [NHS England » Service specification: Gender Identity Services for Adults \(Surgical Interventions\)](#)
2. Information not held. The NWJCC commission all Gender Surgery to the NHSE Surgical specification. As such, the Gender Dysphoria surgical pathway is provided via NHSE: [NHS England » Service specification: Gender Identity Services for Adults \(Surgical Interventions\)](#)
3. Please see provided below, relevant extracts from the Management Group meetings. Please note, names have been withheld under Section 40(2) of the Freedom of Information Act 2000. This information is protected by the Data Protection Act 2018 (DPA) / UK General Data Protection Regulations, as its disclosure would constitute unfair and unlawful processing and would be contrary to the principles and articles 6 and 9 of the UK GDPR. This exemption is absolute and therefore there is no requirement to apply the public interest test.
4. Please see response to question 3.
5. March 2025 review date given, originally. This was not undertaken due to clinical requirements, however. Review of all plastic surgery policies currently underway, including EQIA documentation.
6. Not routinely undertaken by the organisation.
7. A. Risk assessments, equality considerations or impact analyses, in relation to the delay of the review of policies, are not routinely undertaken by the organisation.

B. Information not held: The NWJCC commission all Gender Surgery to the NHSE Surgical specification: [NHS England » Service specification: Gender Identity Services for Adults \(Surgical Interventions\)](#)

8. Exceptionality is no longer a component of the Welsh IPFR process. A link to the newly reviewed IPFR policy can be found here: [Bro Taf Health Authority](#)
9. Exceptionality is no longer a component of the Welsh IPFR process. A link to the newly reviewed IPFR policy can be found here: [Bro Taf Health Authority](#)
10. Information not held.
11. Information not held.

### 13<sup>th</sup> June 2013

MG13/40	<p><b>COMMISSIONING POLICIES FOR: TREATMENT OF BENIGN SKIN CONDITIONS; BODY CONTOURING; AND FACIAL SURGERY, AND POLICY POSITION FOR ABDOMINOPLASTY/APRONECTOMY FOLLOWING SIGNIFICANT WEIGHT LOSS</b></p> <p>Members received the proposed commissioning policies for the treatment of benign skin conditions, body contouring and facial surgery and the policy position for abdominoplasty/apronectomy following significant weight loss from, Director of Planning for WHSSC and, Specialised Planner.</p> <p>In response to [xx], [xx] confirmed that the policies had been consultant on by relevant external stakeholders and had been through the agreed process within WHSSC.</p> <p>Given the time remaining for the meeting it was <b>AGREED</b> that Members would provide comments on or suggested changes within the policies within two weeks to [xx], for consideration and that the policies will be brought back to the Management Group scheduled for 11<sup>th</sup> July for ratification.</p> <p>Members <b>RESOLVED</b> to:</p> <ul style="list-style-type: none"> <li>• <b>NOTE</b> the receipt of the policies for the treatment of benign skin conditions, body contouring and facial surgery and the policy position for abdominoplasty /apronectomy following significant weight loss.</li> </ul>	
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### 11<sup>th</sup> July 2013

MG13/56	<p><b>TO RECEIVE COMMISSIONING POLICIES CP42, 43, 44 AND POLICY POSITION 45</b></p> <p>[xx] noted that the policies had been discussed at the</p>	
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	<p>June Management Group meeting and that members had requested additional time to discuss the policies with other colleagues and advise any amendments.</p> <p>[xx] confirmed that no comments had been received.</p> <p>Members <b>RESOLVED</b> to:</p> <ul style="list-style-type: none"><li>• <b>APPROVE</b> the policies and policy position statement.</li></ul>	
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