



Agenda Item

8.1.4

CTM Health Board

All Wales IPFR Policy (2025)

Dyddiad y Cyfarfod / Date of Meeting	27/11/2025
Statws Cyhoeddi / Publication Status	Open/ Public Not Applicable
Awdur yr Adroddiad / Report Author	Claire Tynan-Preece, Commissioning Manager
Cyflwynydd yr Adroddiad / Report Presenter	Sallie Davies, Deputy Medical Director (TBC)
Noddwr Gweithredol yr Adroddiad / Report Executive Sponsor	Philip Daniels, Executive Director of Public Health

Pwrpas yr Adroddiad / Report Purpose	For Approval
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Engagement (internal/external) undertaken to date (including receipt/consideration at Committee/Group)		
Committee / Group / Individuals	Date	Outcome
All Wales IPFR Policy Implementation Group – includes representation of all Health boards and AWTTTC, QAG, Medical Directors, Board Secretaries and Velindre NHS Trust	November 2022 – July 2025	Supported
Head of Commissioning	08/09/2025	Supported
Assistant Director of Transformation	11/09/2025	Supported
Executive Director of Public Health	12/09/2025	Supported



Quality, Safety & Experience Committee	23/09/2025	Endorsed for Board Approval
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Acronyms / Glossary of Terms	
AWTTC	All Wales Toxicology and Therapeutic Committee
CTMUHB	Cwm Taf Morgannwg University Health Board
IPFR PIG	Individual Patient Funding Request Policy Implementation Group
IPFR QAG	Individual Patient Funding Request Quality Assurance Group
NWJCC	New Wales Joint Commissioning Committee
QC	Queens Council
VUNT	Velindre University Health Trust
WHSSC	Welsh Health Specialised Services Committee
AWMSG	All Wales Medicines Strategy Group

1. Situation /Background

- 1.1 An Individual Patient Funding Request (IPFR) is defined as a *request to a Health Board or NWJCC to fund NHS healthcare for individual patients who fall outside the range of services and treatments that a Health Board has arranged to routinely provide, or commission*. This can include a request for any type of healthcare including a specific service, treatment, medicine, device, or piece of equipment.
- 1.2 The current version of the All Wales Individual Patient Funding Request policy was last reviewed 2017. In July 2022, the Welsh Government tasked the NWJCC (formally WHSSC) with undertaking a '*di minimis*' review of the policy and terms of reference. This was following a Judicial Review NWJCC (formally WHSSC) was subject to in 2021, and where a series of recommendations were made by the QC.
- 1.3 Following an extended period of engagement and consultation with key stakeholders including AWTTC, IPFR QAG, Medical Directors and Board Secretaries of each Health Board and Velindre University NHS Trust (VUNHST). This engagement was predominantly managed via the All Wales IPFR Policy Implementation Group (PIG) (which includes representation from all health boards, NWJCC and AWTTC), this group has been instrumental in ensuring the revised policy is fit for purpose. In August 2025, the final version of the revised policy was agreed by Health boards and the NWJCC (appendix 1).
- 1.4 This paper will provide a high level summary of the key changes within the updated IPFR policy.

- 1.5 Each health board is now required to obtain formal approval to endorse and implement the revised policy.

2. Specific Matters for Consideration

2.1 Outcome of Judicial Review

In December 2021 a judgment was handed down in a judicial review concerning MW – v- (1) WHSSC & (2) Aneurin Bevan UHB (ABUHB), which overturned a decision of the WHSSC (now NWJCC) IPFR panel to decline funding for treatment. This was largely because the court’s interpretation of the NHS Wales Policy for Making Decisions on IPFR’s was significantly different to that of the IPFR panel and indeed the original and intended meaning of the policy. Subsequent legal advice from a QC indicated that the policy would need to be revised if its original and intended meaning was to be reinstated.

3. All Wales IPFR Policy update

- 3.1 The NHS Wales IPFR PIG brings together representatives from Health Boards, the Joint Commissioning Committee, AWTTTC, and Health Technology Wales to ensure the fair and consistent application of the Individual Patient Funding Request (IPFR) Policy across Wales. The group supports decision-making for treatments not routinely provided, promotes best practice, and helps shape national policy. It also works to improve understanding of the IPFR process, enhance data quality, and inform future commissioning. Through collaboration and stakeholder engagement, the PIG fosters a transparent, inclusive, and patient-focused approach to funding decisions.
- 3.2 The NHS Wales IPFR Policy has been updated collaboratively, following a robust development project. The proposed version is accepted by the All Wales IPFR PIG as being fit for purpose. This follows discussion and agreement at a meeting of the IPFR Chairs (or their representatives) in September 2024.

The main changes to note are:

- Revisions to the section explaining how IPFR decisions are made, with more explanation of the criteria to be considered, with particular reference to IPFR applications made under section 9B:
 - Primary criteria relate to whether available guidelines (e.g from NICE or AWMSG) recommend NOT to use an intervention; or if the intervention has NOT been appraised hence no guidelines are in place.
 - Further criteria require the objective assessment of the clinical circumstances of the patient; the potential for significant clinical

benefit; and whether the value for money of the intervention is likely to be reasonable (please refer to table 1).

- The 'decision making guide' has been retained, however is now an appendix rather than embedded with the core Policy, and is considered an 'aide' to assist panel discussion.
- Updated Terms of Reference for the NWJCC IPFR Panel to strengthen clinical representation.
- Inclusion of the Terms of Reference for the IPFR FIG.
- Removal of surplus, convoluted, passages referring to legal challenge.
- Simplification of references to Health Board complaints processes and referrals to Public Services Ombudsman for support.

Table 1, Revision of criteria for IPFR applications considered under section 9B:

Old IPFR policy (2017)	New IPFR policy (2025)
<p>Is the clinical presentation of the patient's condition significantly different in characteristics to other members of that population? and Does this presentation mean that the patient will derive a greater clinical benefit from the treatment than other patients with the same condition at the same stage?</p> <p>IPFR panel to: Consider the evidence supplied in the application that describes the specific clinical circumstances of the IPFR:</p> <ul style="list-style-type: none"> • What is the clinical presentation of this patient? • Is evidence supplied to explain why the clinical presentation of this patient is significantly different to that expected for this disease and this stage of the disease? <p>Is evidence supplied to explain why the clinical presentation means that the patient will gain a significantly greater clinical benefit from the treatment than another patient with the same disease at the same stage?</p>	<p>Does the presentation of the patient's condition mean they are likely to gain significant clinical benefit from the intervention requested?</p> <p>IPFR Panel to: Consider the evidence submitted in the application that describes the specific clinical circumstances of the IPFR:</p> <ul style="list-style-type: none"> • What is the clinical presentation of this patient? • Does the evidence provided explain why this patient is likely to gain a significant clinical benefit when compared to next best alternative for this patient, which may in some cases be best supportive care?



3.3 With the oversight of the IPFR QAG, the application and adherence to the new All Wales IPFR policy will be monitored and any concerns regarding non-compliance with the new criteria will be reported to Health boards and NWJCC via their quarterly quality assurance audits.

4 Key Risks / Matters for Escalation

Following robust discussions with key stakeholders, there are no key risks or matters that require escalation.

5 Assessment

Objectives / Strategy	
Dolen i Nod (au) Strategol BIP CTM / Link to CTMUHB Strategic Goal(s)	Improving Care
	If more than one applies please list below:
Dolen i Feysydd Strategol BIP CTM / Link to CTMUHB Strategic Areas	Choose an item.
	If more than one applies please list below: This policy spans all strategic areas
Dolen i Ddeddf Llesiant Cenedlaethau'r Dyfodol – Nodau Llesiant / Link to Wellbeing of Future Generations Act – Wellbeing Goals 150623-guide-to-the-fg-act-en.pdf (futuregenerations.wales)	A Healthier Wales
	If more than one applies please list below:
Dolen i Hwyluswyr Ansawdd <i>(Canllawiau Statudol Dyletswydd Ansawdd (llyw.cymru)) / Link to Enablers of Quality</i> (Duty of Quality Statutory Guidance (gov.wales))	Whole-systems Perspective
	If more than one applies please list below:
Dolen i Feysydd Ansawdd <i>(Canllawiau Statudol Dyletswydd Ansawdd (llyw.cymru)) / Link to Domains of Quality</i> (Duty of Quality Statutory Guidance (gov.wales))	Person Centred
	If more than one applies please list below: Policy spans all quality domains



Effaith Amgylcheddol/ Cynaliadwyedd (5R) / Environmental /Sustainability Impact (5Rs)	No - Not Applicable
	If more than one applies please list below:

Impact Assessment		
Ansawdd <i>Ydych chi wedi ymgymryd â Sgrinio Asesiad o'r Effaith ar Ansawdd? /</i> Quality <i>Have you undertaken a Quality Impact Assessment Screening?</i>	Yes: <input type="checkbox"/>	No: <input checked="" type="checkbox"/>
	Outcome:	If no, please include rationale below: All Wales policy
Cydraddoldeb a'r Gymraeg <i>Ydych chi wedi ymgymryd â Sgrinio Asesiad o'r Effaith ar Gydraddoldeb a'r Gymraeg? /</i> Equality and Welsh Language <i>Have you undertaken an Equality and Welsh Language Impact Assessment Screening?</i>	Yes: <input checked="" type="checkbox"/>	No: <input type="checkbox"/>
	Outcome for Equality (delete as appropriate): NEUTRAL Outcome for Welsh Language (delete as appropriate): NEUTRAL	If no, please include rationale below:
Cyfreithiol / Legal	Yes (Include further detail below)	
	Changes to the All Wales IPFR policy are recommended following a Judicial Review for which NWJCC was involved.	
Enw da / Reputational	Yes (Include further detail below)	
	The is risk of reputational harm if the policy is not approved and endorsed for use in CTM UHB.	
Effaith Adnoddau <i>(Pobl /Ariannol) /</i> Resource Impact <i>(People / Financial)</i>	There is no direct impact on resources as a result of the activity outlined in this report.	

6 Recommendation

The Board is asked to Approve the revised All Wales IPFR Policy (2025) and approve its implementation within CTMUHB.

7 Next Steps

The date on which the new IPFR policy will be implemented will be co-ordinated across NHS Wales, once all Health Boards and JCC have approved the policy for endorsement via formal governance channels. This is likely to be a date in October 2025.