

Equality and health inequality assessment for process and methods changes

1. Name of the policy, project or programme

Including NICE technology appraisals in NICE guideline topic areas.

2. Directorate or team

Science, Evidence and Analytics Directorate and Centre for Health Technology Evaluation

3. Details of the person/s responsible for the EHIA (EHIA Owner/s)

Nichole Taske, Associate Director, Science, Evidence and Analytics Directorate

Lorna Dunning, Senior Technical Adviser, Centre for Health Technology Evaluation

4. Aims, purpose and outcomes

What are the main aims, objectives and intended outcomes?

The aim of the project is to develop methods and processes to allow us to include NICE technology appraisals into NICE guidelines. NICE technology appraisal recommendations will be incorporated into NICE guidelines with no or minimal changes to the wording and no comparative analysis undertaken.

How does this fit in with the objectives of NICE?

This project supports delivery of our strategic objective to provide guidance that is useful and useable for our users. Currently, NICE guidance is published according to the programme that developed it. This means that users can find it harder to access and navigate all NICE recommendations about a condition because they must search in multiple places on the NICE website to find them. The aim is to provide a

better experience for users and help increase the adoption of NICE guidance, leading to better outcomes for patients and better use of NHS resources.

How does it relate to other NICE policies or activity?

It should be noted that there were concurrent NICE consultations during the period of this consultation, the outcomes of which (where relevant) will be considered in the final approach to bringing together NICE guidance. The other consultations were:

- [Process and methods for NICE-wide topic prioritisation](#)
- [Interim methods and processes for Late Stage Assessment \(LSA\) in HealthTech](#), and
- [Working alongside people and communities at NICE: a strategy](#)

Who will benefit from it?

Users of our guidelines will benefit because this approach allows them to find all the relevant information they need about the treatment of a condition in one place.

Patients and manufacturers will benefit because incorporating NICE technology appraisals into NICE guidelines ensures that they become more quickly embedded within treatment pathways and ensure that patients are getting the most effective treatments.

What are the main activities involved in implementation?

Implementation steps will include:

- working across NICE teams to develop methods and processes for bringing together NICE guidance on a topic
- agreeing approaches to engagement with stakeholders
- continuing to develop and refine the interim methods and processes statement
- applying the approach to incorporation of NICE technology appraisals into NICE guidelines, in line with our commitment under the [2024 voluntary scheme for branded medicines pricing, access and growth](#).

5. Engagement and involvement

This EHIA was been developed by a cross-organisational team responsible for oversight of the project. It was consulted on as part of the consultation on the interim methods and process statement.

6. Other evidence and information considered

A [consultation](#) on the interim methods and process statement was undertaken with all stakeholders to seek their views on the proposals. As part of this consultation process, we sought views on whether any of the proposals raise equalities or health inequality issues.

We received 21 comments from 12 stakeholders on the EHIA. Most comments related to the potential impact of integration of NICE technology appraisals on equality and health inequalities. In light of stakeholder comments, the approach that was proposed for integration will not be progressed. Instead, we plan to collaborate with stakeholders in the coming months to work through ideas on how we can bring NICE technology appraisals together in NICE guidelines in cases where incorporation is unlikely to meet user needs.

Key themes raised:

- The potential impact on health inequalities resulting from any changes to the legal status of NICE technology appraisal guidance compared with NICE guideline recommendations.
- Assurance was requested that integration of NICE technology appraisals into NICE guidelines would not inadvertently reduce the benefit to patients.
- The intersectional effect of protected characteristics and that these populations are often not captured in research evidence.
- Integration of NICE technology appraisals may lead to inequality across devolved nations with inequality of access to complex treatments because of disability and age.

7. Impact and mitigation

Impact and mitigation for protected characteristics or wider determinants of health

Protected characteristic or wider determinant of health	Impact	Mitigation
Age	<ul style="list-style-type: none"> NICE guidelines do not cover all clinical areas and conditions. Incorporation of NICE technology appraisals into a NICE guideline aims to increase adoption of technologies in the NHS. Some populations may be indirectly disadvantaged because they are not covered within a NICE guideline. Implementation of the severity modifier in the Centre for Health Technology Evaluation raised concerns as to whether there would be limited scenarios in which older populations could qualify for the modifier. However, initial exploration of this issue in the NICE technology appraisals which have a severity modifier applies suggests that there is no unfairness on the basis of age for the design of the severity modifier. Incorporation of NICE technology appraisals in NICE guidelines is unlikely to impact on equality issues because there is no re-assessment of the evidence. 	<ul style="list-style-type: none"> We have mapped all NICE technology appraisals to relevant NICE guidelines. No evidence for systematic bias on the basis of age for topics not covered by a NICE guideline has been identified. Mitigating against this occurring in the future could include appropriate links to surveillance (system intelligence and monitoring) and prioritisation activities within NICE. Prioritisation will consider updates or expansion of existing NICE guidelines or a new guideline where this will add value to the NHS. We will continue to monitor the implementation of the severity modifier in the NICE technology appraisal programme. We will continue to be mindful of equality concerns as methods development continues in areas where incorporation will not meet user needs.
Disability	Under the Equality Act 2010, disabilities include progressive conditions such as cancer, multiple sclerosis or HIV and we are aware that most conditions considered by the NICE technology appraisal programme relate to some form of disability. Incorporating NICE technology appraisals in treatment pathways within NICE guidelines	See 'comments across all equality strands' below

	<p>will support uptake of clinically and cost-effective treatment options.</p> <p>We are aware that some presentation styles may not meet accessibility requirements. In development of our approach to presentation of NICE guidance, we will be mindful of the need and lawful requirements that all audiences are able to read, access and understand our guidance.</p>	
Race or ethnicity	None identified	N/A
Gender reassignment	None identified	N/A
Marriage and civil partnership	None identified	N/A
Pregnancy and maternity	None identified	N/A
Religion and belief	None identified	N/A
Sex	None identified	N/A
Sexual orientation	None identified	N/A
Socioeconomic status	None identified	N/A
Inclusion health and vulnerable groups	None identified	N/A
Comments across all equality strands	<p>For all groups, incorporating treatments specified in NICE technology appraisals within treatment pathways in NICE guidelines is expected to support more rapid uptake of new treatment options.</p>	<p>Aligning methods across the Centre for Health Technology Evaluation and the Centre for Guidelines should support consistency in decision-making between Centres within NICE. The NICE guideline development process itself is subject to an equality and health inequalities assessment process and so specific equalities issues will be considered for every NICE guideline. The NICE technology appraisal evaluations themselves will also have been subject to equality impact assessment.</p>

8. EHIA development

This EHIA was updated following [consultation](#) with stakeholders in April 2024.

Date: 20/06/24