

**Weight Watchers UK: Response to the Department of Health's proposals for
"Protecting and promoting patients interests – Licensing providers of NHS services"
15th October 2012**

Weight Watchers welcomes the Department of Health's (DH) measures to protect the interests of patients in licensing providers of NHS services. The Company has provided lifestyle weight management services to the NHS for almost a decade. In 2011 almost two thirds of Primary Care Organisations in England had procured services from Weight Watchers for their overweight and obese patients. As a consequence, Weight Watchers has accrued considerable experience in provision of services to the NHS sector. It understands the environment, issues around patient choice and commissioning processes. From this experience the Company believes there are a small number of specific issues related to the licensing of providers of lifestyle weight management services for NHS patients. These are as follows:

Outcomes for lifestyle weight management services are a better indication of service quality than licenses

Lifestyle weight management service outcomes are a far more sensitive indication of service quality than licenses. Weight Watchers has commissioned a considerable amount of independent evaluation of its NHS Referral Services. Both qualitative and quantitative data has been collected, analysed and reported through peer reviewed publications. Aspects of patient satisfaction and weight loss outcomes have been a particular focus of these evaluation studies, which have provided vital information to drive up the quality of Weight Watchers services for patients and commissioners.

The best method for NHS Commissioners to differentiate the reputable weight management programmes which deliver safe and demonstrable weight loss outcomes is to first look at those providers who meet the NICE (2006) best practice guidance* and secondly to look at the published evidence of efficacy and effectiveness. These two steps should be the primary considerations in qualifying suitable providers of lifestyle weight management services rather than licensing.

The exemptions from licensing need more emphasis and need to be more explicit

Currently the proposals for exemptions from licensing with MONITOR include:

- Small providers (less than 50 employees and NHS turnover of less than £10m/year)
- Those not required to register with the Care Quality Commission (CQC).

Weight Watchers (which is not currently required to register with the CQC) agrees with these exemptions. However, it feels that more could be done within the document to make these exemptions more explicit – it suggests that greater clarity and emphasis be given to these exemptions through:

- Clearer and non-ambiguous language on page 10 to list and explain who specifically would be exempt from licensing,
- Presenting a summary box of exemptions both in section 1a and at the front of the document, so readers can quickly extract this vital element of information which is relevant to them.

*National Institute of Health and Clinical Excellence (2006) Obesity: the prevention, identification, assessment and management of overweight and obesity in adults and children.