



Medicines & Healthcare products
Regulatory Agency

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[REDACTED]

19 December 2023

FOI 23/938

Dear [REDACTED]

Thank you for your information request, dated 25 November 2023, where you asked questions about the Commission of Human Medicine's Isotretinoin Implementation Expert Advisory Working Group. I have stated the questions in full and the answers are below.

- *The names of the professional panel members who contributed to the development of these changes.*

Based on the nature of your query, the information you have requested falls under an exemption in the FOI Act, Section 40(2). Section 40 applies when the requested information is personal data (any information relating to an identified or identifiable living individual) and disclosure would breach one or more of the data protection principles. The Agency is satisfied that disclosure here would breach the first data protection principle, in particular the requirement of fairness on the basis that disclosure would not be reasonably expected by the people mentioned in the information.

To assist, it might be useful for you to be aware that there was a range of expertise represented on The Commission on Human Medicines Isotretinoin Implementation Advisory Expert Working Group including dermatology, adult and paediatric psychiatry, paediatrics, general practice, lay representation, pharmacy. In addition, a range of organisations were represented including National Institute for Health and Care Excellence (NICE), Care Quality Commission (CQC) and General Medical Council (GMC).

- *Clarification regarding any potential conflicts of interests among panel members.*

All members have to follow the [Code of Practice](#) and conflict of interest forms were completed. Some members declared non-personal interests that were non-specific



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to the topic being considered. A non-personal non-specific interest will not normally affect the individual's participation in the meeting but should be declared in the usual way. For more information on the definition and examples, please see the Code of Practice.

- *The percentage of panel members who are against isotretinoin, especially in the patient group.*

This question was not asked of The Commission on Human Medicines Isotretinoin Implementation Advisory Expert Working Group. Therefore, we do not hold this information.

- *Access to all documentation and deliberations that led to the conclusions and recommendations presented in the report, including evidence of a balanced representation of opinions from relevant UK stakeholders.*

As you are aware, The Commission on Human Medicines Isotretinoin Implementation Advisory Expert Working Group report has been published in full. Redacted versions of the minutes are attached. Section 40(2) We can confirm that the only material we have redacted under this Section is that which concerns personal data: this information is withheld as it falls under the exemption in sections 40(2) and 40(3)(a)(i) of the FOIA, which relates to the personal data of which the applicant is not the data subject. Section 40(2) of the FOIA provides that personal data relating to other persons is exempt information if disclosure would breach the Data Protection Act 1998 (DPA). We consider that disclosure of this information is likely to breach the first data protection principle in Schedule 1 to the DPA, which relates to the fair and lawful processing of personal data. Therefore, we have concluded that this information is exempt from disclosure under section 40(2) read in conjunction with section 40(3)(a)(i) of the FOIA.

If you have a query about this response, please reply to this email.

If you are dissatisfied with the handling of your request, you have the right to ask for an internal review. Internal review requests should be submitted within two months of the date you receive this response and addressed to: info@mhra.gov.uk

Please remember to quote the reference number above in any future communications.

If you were to remain dissatisfied with the outcome of the internal review, you would have the right to apply directly to the Information Commissioner for a decision. Please bear in mind that the Information Commissioner will not normally review our handling of your request unless you have first contacted us to conduct an internal review. The Information Commissioner can be contacted at:

Information Commissioner's Office



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Yours sincerely,

Committee Services Team