

Our Reference North East and North Cumbria ICB\
FOI ICB 26–158

North East and North Cumbria ICB
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By Email

27 July 2026

Dear Applicant

Freedom of Information Act 2000 – Request for Information – NHS North East and North Cumbria Integrated Care Board (NENC ICB)

Thank you for your request received on 30 June 2026 for information held by NHS North East and North Cumbria Integrated Care Board (the ICB) under the provisions of the Freedom of Information Act 2000. The ICB covers the areas of County Durham, Newcastle Gateshead, North Cumbria, North Tyneside, Northumberland, South Tyneside, Sunderland, and Tees Valley.

Please find the information you requested on behalf of the ICB as follows.

Your Request

Under the Freedom of Information Act 2000, I would be grateful if you could provide the following information relating to NHS dental contract funding within the North East and North Cumbria:

1. Any reports, presentations, business cases or other documents produced by the North East and North Cumbria ICB analysing the cost of delivering NHS dentistry in the North East and North Cumbria.
2. Any modelling undertaken by the ICB to determine the cost of delivering one Unit of Dental Activity (UDA), including:
 - the calculated sustainable UDA rate;
 - the methodology used;
 - the principal assumptions;
 - any regional variations identified.
3. Any documents showing the current average UDA values paid to NHS dental practices across the North East and North Cumbria.

Our Response

1. The method used to undertake the true cost of care exercise was via contract specific on site and open book audit of NHS Dental contract holder business accounts, income, costs, patterns of NHS care delivered and workforce. It also required full disclosure and review of their private and NHS business detailed records to allow for appropriate cost and income disaggregation.

This information was supplied to the ICB in the expectation that it would be kept confidential; in addition, in relation to providers who are individuals, this information was also their personal data. The nature of the information would allow the financial performance of the providers to be understood and would be likely to cause the provider to suffer commercial prejudice were it to enter the public domain by providing insights into the relative strengths and weaknesses of the providers business.

This contractor specific and individual business source data, related analysis and outcome information included within the related documentation being requested forms the vast majority of the report content and as such disclosure of these reports to the public would result in an actionable breach of the duty of confidence owed to third parties and would be likely to result in commercial prejudice.

In some cases, disclosure would also result in the release of personal data of third parties in circumstances where this would amount to a breach of the data protection principles under the UK GDPR. Accordingly, we take the view that the information is exempt under the exemptions provided by sections 41 and 43(2) of the Freedom of Information Act 2000, and in the case of information relating to individuals, under section 40(2) and (3A) of the Act.

In reaching this conclusion, we have considered whether there would be a public interest defence to any claim for breach of confidence, whether release of personal data to the world at large would nevertheless be permissible and whether the balance of public interest in withholding commercially sensitive information outweighs the public interest in demonstrating transparency, accountability and value for money in relation to the use of public funds.

In reaching our conclusions on this, we have also taken into account the information about the providers that is already made available to the public – please see below.

Where any reports relating to the subject matter requested have only included generalised or non identifiable aggregated information and analysis they will be publicly available here: <https://northeastnorthcumbria.nhs.uk/about-us/corporate-information/governance/meetings-and-agendas/>. Accordingly, these are exempt under section 21 of the Act.

2. The methodology applied to determine the cost of delivering NHS Dentistry mandatory services access was determined through evidenced findings and national benchmarking as follows:
 - Full business, financial, contractual and clinical on site and transparent open book audit of a wide range of local dental businesses that hold NHS Contracts and who were experiencing financial pressures leading to high risk of contract hand back at that time having secured their full agreement to the process.
 - The contracts reviewed ranged from corporate to individual contract types and delivering across a range of localities and population demographics across the North East and North Cumbria including localities of confirmed high deprivation and dental deserts.

- The review focused upon disaggregation of private v NHS delivery costs, income, workforce and activity with then a deep dive focus upon NHS income, costs, FP17 claiming and delivery patterns and general practice pressures.

The evidence drawn from this exercise being drawn from NHS Dental contract holder commercial business accounts, income, costs, pattern of care and workforce commercial records and as such this information is exempt under the exemptions provided by sections 41 and 43(2) of the Freedom of Information Act 2000, and in the case of information relating to individuals, under section 40(2) and (3A) of the Act as previously outlined.

This local open book and fully transparent local audit work was then supplemented by national UDA rate benchmarking drawn from open public sources to allow the local findings to be compared and contrasted against a national UDA rate back drop and the national NHS England minimum UDA rate, which is currently set at £28.

This national benchmarking information can be derived from NHS England national dental statistics that are published and available is publicly available across a range of financial years here: [NHS Dental Statistics – NHS England Digital](#) and [Dental – England | NHSBSA](#)

The local process and methodology applied above subsequently received independent external 'on site' review and challenge and scrutiny from the Commercial Team of the Government Cabinet Office in 2025.

3. This local ICB information can be derived from NHS England national dental statistics that are published and available is publicly available across a range of financial years here: [NHS Dental Statistics – NHS England Digital](#) and [Dental – England | NHSBSA](#). This information is therefore exempt pursuant to section 21 of the Freedom of Information Act 2000, as being reasonably accessible to the applicant already.

In accordance with the Information Commissioner's directive on the disclosure of information under the Freedom of Information Act 2000 your request will form part of our disclosure log. Therefore, a version of our response which will protect your anonymity will be posted on the NHS ICB website <https://northeastnorthcumbria.nhs.uk/>.

If you have any queries or wish to discuss the information supplied, please do not hesitate to contact me on the above telephone number or at the above address.

If you are unhappy with the service you have received in relation to your request and wish to request a review of our decision, you should write to the Information Governance Manager using the contact details at the top of this letter quoting the appropriate reference number.

If you are not content with the outcome your review, you do have the right of complaint to the Information Commissioner as established by section 50 of the Freedom of Information Act 2000. Generally, the Information Commissioner cannot make a decision unless you have exhausted the ICB's complaints procedure.

The Information Commissioner can be contacted at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF or www.ico.org.uk.

Any information we provide following your request under the Freedom of Information Act will not confer an automatic right for you to re-use that information, for example to publish it. If you wish to re-use the information that we provide and you do not specify this in your initial application for

information then you must make a further request for its re-use as per the Re-Use of Public Sector Information Regulations 2015 www.legislation.gov.uk. This will not affect your initial information request.

Yours faithfully

Information Governance Support Officer

**Information Governance Support Officer
North East and North Cumbria Integrated Care Board**