

Consultation on draft guideline - Stakeholder comments table 16/11/23 – 1/12/23

Comments forms with attachments such as research articles, letters or leaflets cannot be accepted.

Stakeholder	Document	Page No	Line No	Comments Please insert each new comment in a new row	Developer's response Please respond to each comment
Association of Breast Surgery	Guideline	General	General	We agree with the conclusions and guidance. The ABS have recently conducted an independent review and have come to the same conclusions regarding margins for invasive disease. Our guidelines are due out shortly and mirror those in this proposed NICE guidance.	Thank you for your comments and support of the recommendations.
Association of Breast Surgery	Guideline	General	General	We broadly agree with the conclusions regarding surgical margins for DCIS. Evidence to support this is due to be presented in an international breast cancer conference next week.	Thank you for your comments and support of the recommendations.
NHS England Learning Disability and Autism Programme	Guideline	General	General	We strongly suggest the document makes reference to making reasonable adjustments. This is a legal requirement as stated in the Equality Act 2010. Adjustments aim to remove barriers, do things in a different way, or to provide something additional to enable a person to receive the assessment and treatment they need. Possible examples include; allocating a clinician by gender, taking blood samples by thumb prick rather than needle, providing a quiet	Thank you for your comment. As reasonable adjustments are a legal requirement, we expect that these are being implemented and therefore do not include specific mention of them as part of the recommendation on discussing the benefits and risks about treatment decisions. However, we have considered barriers to access faced by people with learning disabilities during the development of this update. In developing the recommendations, the committee took into account the health inequalities issues identified as part of the



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				space to see the patient away from excess noise and activity. We recommend including reference to the Reasonable Adjustment Digital Flag (RADF) and the RADF Information Standard which mandates all providers and commissioners of health services and publicly funded social care to identify, record, flag, share, meet and review Reasonable Adjustments, including details of their underlying conditions. DAPB4019: Reasonable Adjustment Digital Flag - NHS Digital	equalities and health inequalities assessment (EHIA) that accompanies this work. The issues identified included the barriers people with learning disabilities and people from neurodiverse populations may face when accessing information and resources regarding surgery and post-surgery treatment plans. The committee agreed that it is important that a person's individual circumstances are taken into consideration when health professionals explain the benefits and risks of having further surgery. For this reason, a recommendation is included which refers to the sections on communication in the NICE guidelines on patient experience in adult NHS services (CG138) and shared decision making NICE guideline (NG197). In addition, the committee recommended that the person's circumstances, needs and preferences should form part of the decision- making process. This discussion would include any issues that could affect whether someone chooses further surgery. This is



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					intended to help ensure that treatment is tailored to the individual patient and that any barriers to particular treatment options are considered and addressed where possible.
					Further information about what the committee considered when making recommendations and more information about their discussions can be found in the rationale of the guideline, the committee discussion section of the evidence review (evidence review N: on further surgery after breast-conserving surgery based on tissue margins) and the EHIA document. In addition, in response to your comments, we have added reference to reasonable adjustments and the RADF to the evidence review discussion under the section on other factors the committee took into account.
NHS England Learning Disability and Autism Programme	General	General	General	We recommend including reference to the importance of Communication: Using simple, clear language, avoiding medical terms and 'jargon' wherever possible. Some people may be non-verbal and unable to describe verbally how they feel. Pictures	Thank you for your comments. The committee discussed the importance of shared decision making, tailoring health care to personal needs and ensuring that information is provided in a clear and suitable format. The committee therefore included a recommendation linking to the sections



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				may be a useful way of communicating with some people, but not all.	covering communication in the NICE guideline on <u>patient experience in adult NHS</u> <u>services</u> (CG138) and the <u>shared decision</u> <u>making</u> NICE guideline (NG197).
					The committee also discussed specific considerations for people with learning disabilities for example, making adjustments to how information is provided regarding surgery and post-surgery treatment plans. The committee's discussions of health inequalities are included in the committee discussion section of the evidence review and in the equalities and health inequalities assessment (EHIA) of this update.
NHS England Learning Disability and Autism Programme	General	General	General	Please note recent LeDeR research: <u>kcl.ac.uk/ioppn/assets/fans-dept/leder-main-</u> <u>report-hyperlinked.pdf</u>	Thank you for your comment. We have shared this research with the team that developed the <u>breast cancer health</u> <u>inequality briefing</u> and they have added a new subsection (4.2 Inequalities in outcomes) under the protected characteristics disability heading to include the recent data from the LeDeR research about the impact of having a learning disability on the survival of people with breast cancer. The updated version breast cancer



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					health inequality briefing will be published at the same time as the publication of the update of the NICE guideline on early and locally advanced breast cancer (further surgery update).
Royal College of Nursing	General	General	General	Thank you for the opportunity to contribute to the above consultation, we received no member comments this time.	Thank you for your response.

*None of the stakeholders who commented on this clinical guideline have declared any links to the tobacco industry.