BRITISH ACADEMY
OF AUDIOLOGY

NICE
By email

Dear Sirs

11/11/2026

Re: Concerns regarding expert selection, and published expert commentary for HTG10886 Hearing aids for adults with hearing loss: existing use assessment

On behalf of the British Academy of Audiology (BAA), I write to express significant concerns regarding both the process for selection of expert contributors to the Hearing Aids for Adults assessment and the publication of comments which include derogatory statements presented as evidence.

BAA fully supports robust debate, challenge and scrutiny and recognises that NICE must consider a wide range of perspectives when assessing technologies and service models. Our concern is that the published expert commentary include sweeping, derogatory and, unsubstantiated claims about regulated healthcare professionals. Statements include

"Private hearing aid sector can be predatory including misselling of hearing aid models (eg old models as newer version), very limited after care, not clearly explaining consumer rights including right to return and refund"

*"However, whilst the numbers are highlighted by NGO's, they tend to exaggerate wildly because many people with a HL do not feel it impacts their QoL whereas many people find it hugely life affecting." **

*"Many private practitioners (usually Hearing Aid Dispensers, HAD) simply do not have the education and training to do things properly, or understand issues for many patients. However, they do sell HAs with a great deal of confidence, however misplaced." **

*"They need to be able to be switched to different compression ratios and compression speeds (although many audiologists wouldn't know what this means, especially HADs)." **

These statements are presented as expert evidence, yet offer broad and disparaging generalisations about entire professional groups and Non-Governmental Organisations (NGOs) that are **not substantiated by any evidence**. This risks damaging confidence in both NHS audiologists and private sector hearing aid dispensers[1].

This raises legitimate concerns around how NICE assesses impartiality when identifying experts, and whether sufficient consideration is given to views expressed that clearly indicate prejudice towards stakeholder groups.

We therefore ask NICE to provide clarification on the following matters:

- What criteria are used to assess the suitability of expert contributors?
- What safeguards exist to prevent prejudicial or derogatory commentary being presented as expert evidence?
- How does NICE challenge or contextualise factual inaccuracies contained within expert submissions?

[1] Hearing Aid Dispensers are regulated healthcare professionals registered with the Health and Care Professions Council (HCPC). They are subject to standards of proficiency, continuing professional development requirements and fitness-to-practise procedures.

* Withdrawn from current online version of Existing use assessment

- Does NICE consider the language contained within these submissions to be consistent with the standards it expects from contributors to its processes?

BAA values its relationship with NICE and recognises the significant role NICE plays in shaping healthcare policy and practice. We are concerned that the comments included within the existing use assessment document could erode clinicians' confidence in these recommendations and potentially patient's views of healthcare professionals.

We would welcome the opportunity to discuss these concerns further and request a formal response outlining NICE's position on the issues raised.

Yours sincerely,



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