BRITISH ACADEMY
OF AUDIOLOGY

Dr Rhydian Phillips
Director of Diagnostics & Transport
NHS England
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Dear Dr Phillips,

We understand that the Department of Health and Social Care/ NHS England intends to engage private providers to support diagnostic services in the NHS, specifically around static and mobile diagnostic capacity, innovative technologies, workforce development, community-based diagnostics, remote monitoring, and digital interoperability.

We are encouraging of support for innovation of service delivery and provision, but would urge consideration of the following:

I. Clear specification and monitoring of outsourced services.

BAA's forthcoming What Good Looks Like checklist outlines the essential, uniform standards that all commissioned audiology services (regardless of whether NHS or private) should meet. These include:

a. Accreditation (UKAS IQIPS), compliance with NICE NG98, and adherence to professional body standards (e.g., British Society of Audiology and British Academy of Audiology recommended procedures and quality standards).

b. Compliance with accessibility standards.

c. Defined outcome measures supported by high-quality audit and feedback processes.

d. Integration with wider multidisciplinary teams and community support.

e. Transparent funding models, appropriate infrastructure investment, and safeguards against unethical commercial practices.

At present, there is no effective monitoring mechanism for these requirements, despite the existing use of private providers (suggests 35% or 2 million procedures delivered privately, Independent Sector Collaboration in Diagnostic Service Transformation, November 2025). Establishing such processes is essential to ensure equitable care for all service users, regardless of provider

II. Awareness of the hidden costs of inappropriate commissioning.

As per our recent letter on the current increased risks to viability and quality of NHS audiology services *{insert date and title here},* we have been made aware of cases where private providers are ceasing to provide services when activity caps are exceeded, resulting in increased waiting times and poorer outcomes for service users.

III. Effective evaluation of new technologies for diagnostics.

Emerging technologies have significant potential to reduce workforce pressures, enhance diagnostic quality, and improve patient experience. However, audiology has historically received limited applied clinical research funding, limiting development in this area. Whilst we are encouraging of involvement of industry partners in this process, we would recommend investing in robust evaluation programmes to ensure optimal use of technology for patient benefit.

IV. Estates and Facilities

The recent Kingdon Review (2025) identified systemic failures in paediatric audiology services and highlighted the impact of substandard equipment and facilities. A key concern on the role of private providers will be their access to quality equipment and estates, and the investment required to ensure facilities are fit for purpose. We would encourage that investment is focussed on NHS estates as the most cost-effective approach, and to ensure that these facilities remain accessible to NHS services.

There are already strong examples of effective collaboration between NHS and private services (e.g., the collaborative partnership in Cambridgeshire and Peterborough where Cambridge University Hospitals and North West Anglia Foundation trust worked with Inhealth and Specsavers, or the work to address a short-term capacity bottleneck undertaken by Scrivens together with the ICB Contract Management team and Doncaster and Bassetlaw Teaching Hospital NHS Foundation Trust's audiology department). In both cases, the priority was improving outcomes for patients including faster assessment and treatment, improved continuity of support and quality of care.

We also recognise that healthcare networks can improve governance dynamics (Unravelling collaborative governance dynamics within healthcare networks)). We therefore encourage DHSC/NHSE to explore that actively support collaborative approaches to these challenges.

We would welcome the opportunity to discuss how we can support this initiative as it develops.

Yours sincerely,



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