

Date 26/11/2025
Your Ref
Our Ref 10762

Enquiries to Richard Mutch
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richard.mutch@nhs.scot

Dear

FREEDOM OF INFORMATION – PRESCRIBING

I write in response to your request for information in relation to prescrii

Question:

- For each of the past 10 financial years (2014/15 to 2023/24, or the most recent 10-year period available), please provide top 10 medicines by total estimated cost for medicines positively appraised, prescribed or issued in all sectors.
- For each of the past 10 financial years (2014/15 to 2023/24, or the most recent 10-year period available), please provide the total expenditure on Pembrolizumab (brand name Keytruda).

Answer:

Top spend in acute services by year - £K - Drug Name	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025/ EST
IVACAFTOR		1886	2789	4256	9458	12289	13384	13206	14103	14375
ELEXACAFTOR / TEZACAFTOR / IVACAFTOR					2231	8063	10251	10718	11562	11785
PEMBROLIZUMAB	802	1466	2779	2832	4485	4630	4297	6618	6839	7288
IMMUNOGLOBULIN NORMAL	3296	3509	2308	3108	3652	3926	4509	5378	5418	5629
VEDOLIZUMAB			2947	3929	4295	4880	4986	5497	5275	4826
AFLIBERCEPT	4581	5108	6192	6327	5755	6116	6011	6016	4137	3934
OCRELIZUMAB							2690	3358	3568	3740
DARATUMUMAB									3594	3722
UPADACITINIB										3220
OFATUMUMAB										2608
ADALIMUMAB	3892	6225	5986	2415	2317					

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Chair Professor John Connaghan CBE
Chief Executive Professor Caroline Hiscox
Lothian NHS Board is the common name of Lothian Health Board

TRASTUZUMAB	2586	2398	2288							
RITUXIMAB	2441	1932								
DIMETHYL FUMARATE	2433	2599	2954	3101	3312	3552	3507	3154		
EMTRICITABINE AND TENOFOVIR	2079									
INFLIXIMAB	1948	1877		1890						
IMATINIB	1783									
ETANERCEPT	1604	3320	2634	2264	2109	2489	2302			
CERTOLIZUMAB		1963	2229	1876						
INFLUENZA VACCINE						2184				
USTEKINUMAB					2893	3635	4168	4864	3605	
VARICELLA-ZOSTER VACCINE								2785	3250	
Total Spend Top 10	26643	30818	33108	31998	40507	51765	56105	61594	61352	61127

Notes

In 2016/2017 Pembrolizumab was not in the top 10 spend

YTD 2025/26 is 7 months data so full year estimate prorates this spend

Blank does not mean that there is 0 spend simply that the medicine is not within the top 10.

Question:

3. For each of the past 10 financial years (2014/15 to 2023/24, or the most recent 10-year period available), please provide the number of individual patients treated with Pembrolizumab.

Answer:

Year	Patients
2016/17	20
2017/18	43
2018/19	80
2019/20	127
2020/21	191
2021/22	194
2022/23	211
2023/24	305

2024/25	350
2025/26	269

Question:

4. For each of the six patients who were/have been on Pembrolizumab for the longest, what has it cost the Board per patient?

Answer:

This information is not held in centrally extractable format as it requires data linkage which we do not routinely perform.

Under the Freedom of Information Act NHS Lothian is not required to create new records to enable it to respond to your enquiry. This information is not collated or held in aggregate form and it would be necessary to review all case files relating to patients over the period you have requested to assemble the information you seek. Even if NHS Lothian did this – and there would be significant cost implications in doing so – it would be unable to respond in full to your request. The information requested is therefore exempt under section 12.1 – Cost.

Question:

5. Please provide a list of all licensed indications for which Pembrolizumab is currently used within the Board. For each indication, please provide the year in which it was first licensed for use.

Answer:

NHS Lothian delivers all of the licensed indications of pembrolizumab which can be found on the Summary of Product Characteristics available at [KEYTRUDA 25 mg/mL concentrate for solution for infusion - Summary of Product Characteristics \(SmPC\) - \(emc\) | 2498](#), with the exception of biliary tract carcinoma (not approved by the Scottish Medicines Consortium)

Year of license is not held within NHS datasets and the enquirer would be best directed to the medicine manufacture for this information

Question:

6. For each of the past 5 financial years (2019/20 to 2023/24, or the most recent 5-year period available), how many legal challenges or complaints have you had regarding Pembrolizumab and what was the nature of each of these?

Answer:

There have been no claims or complaints in relation to this.

Question:

7. For each of the past 10 financial years (2019/20 to 2023/24, or the most recent 10-year period available), how many adverse events, and separately, serious adverse events, have you had which reference Pembrolizumab?

Answer:

The table below details the number of adverse events reported for the financial years 01/04/2019 to 31/03/2025 broken down by Severity (level of harm). There were no Serious (Major harm or Death) adverse events reported.

	2019	2020	2021	2022	2023	2024	2025	Total
No known adverse effect at this time	5<	5<	5<	5<	5<	5<	5<	*
Harm to a person - minor	0	0	0	0	0	5<	0	5<
Damage or loss to property - moderate	0	0	0	5<	0	0	0	5<
Total	5<	5<	0	5<	5<	5<	5<	9

To protect the identity of the individuals involved any figure of 5 or less has not been shown in the table above. Since we do not have their consent to release this data from their records, the information is exempt under section 38(1)(b) of the Freedom of Information (Scotland) Act i.e. to provide it would breach the Data Protection Act (2018).

I hope the information provided helps with your request.

If you are unhappy with our response to your request, you do have the right to request us to review it. Your request should be made within 40 working days of receipt of this letter, and we will reply within 20 working days of receipt. If our decision is unchanged following a review and you remain dissatisfied with this, you then have the right to make a formal complaint to the Scottish Information Commissioner within 6 months of receipt of our review response. You can do this by using the Scottish Information Commissioner's Office online appeals service at www.itspublicknowledge.info/Appeal. If you remain dissatisfied with the Commissioner's response you then have the option to appeal to the Court of Session on a point of law.

If you require a review of our decision to be carried out, please write to the FOI Reviewer at the email address at the head of this letter. The review will be undertaken by a Reviewer who was not involved in the original decision-making process.



FOI responses (subject to redaction of personal information) may appear on NHS Lothian's Freedom of Information website at: <https://org.nhsllothian.scot/FOI/Pages/default.aspx>

Yours sincerely

ALISON MACDONALD
Executive Director, Nursing
Cc: Chief Executive