

# Health Technology Briefing

## May 2023

### Ondansetron for treating alcohol use disorder

Company/Developer

Adial Pharmaceuticals

New Active Substance

Significant Licence Extension (SLE)

NIHRIO ID: 28420

NICE TSID: Not available

UKPS ID: Not available

### Licensing and Market Availability Plans

Completed phase III trial

### Summary

Ondansetron is currently in clinical development for the treatment of alcohol use disorder (AUD). AUD consist of disorders characterised by compulsive heavy alcohol use and loss of control over alcohol intake. AUD are some of the most prevalent mental disorders globally, especially in high-income and upper-middle-income countries; and are associated with high mortality and burden of disease, mainly due to medical consequences, such as liver cirrhosis or injury. Despite their high prevalence, AUD are undertreated partly because of the high stigma associated with them. The relapse rate of people with AUD is high with few effective treatment options available. Factors such as family circumstances, age, and social norms are said to influence alcohol misuse.

Ondansetron is in a class of medications called serotonin 5-HT<sub>3</sub> receptor antagonists. It works by blocking the action of serotonin, a natural substance that may contribute to alcohol dependence. Several studies have shown that ondansetron helps reduce alcohol cravings for people with AUD. Ondansetron has an oral route of administration, and if licenced, will offer additional treatment option for people with AUD.

### Proposed Indication

This briefing reflects the evidence available at the time of writing and a limited literature search. It is not intended to be a definitive statement on the safety, efficacy or effectiveness of the health technology covered and should not be used for commercial purposes or commissioning without additional information. A version of the briefing was sent to the company for a factual accuracy check. The company was available to comment.

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Treatment of alcohol use disorder (AUD) in adults.<sup>1</sup>

## Technology

### Description

Ondansetron (Zofran, ADO4) is a potent, highly selective 5-hydroxytryptamine receptor-antagonist.<sup>2</sup> Serotonin-3 receptors, also called 5-Hydroxytryptamine (5-HT<sub>3</sub>) receptors, are classes of proteins expressed in the central nervous system in regions involved in the reward system, processing of pains and other controls.<sup>3</sup> Molecular studies show that alcohol potentiates selective 5-HT<sub>3</sub> receptor-mediated ion currents, an effect blocked by selective 5-HT<sub>3</sub> receptor antagonists.<sup>4-6</sup> Mesocorticolimbic dopamine pathways mediate alcohol's rewarding effects and that of other abused substances.<sup>6-11</sup> Densely distributed 5-HT<sub>3</sub> receptors in mesocorticolimbic neuronal terminals regulate dopamine release.<sup>6,12,13</sup> Selective 5-HT<sub>3</sub> receptor blockade, by attenuating dopamine release, reduces alcohol consumption in several animal models and across species.<sup>6,14-22</sup>

Ondansetron is currently in clinical development for the treatment of adult patients with AUD. In phase III clinical trial (NCT04101227; ONWARD), participants received an oral dose (0.33 mg) of ondansetron twice a day.<sup>1</sup>

### Key Innovation

Effective treatment for AUD and alcohol-associated diseases remains challenging, and cognitive and behavioural treatment, with or without pharmaceutical interventions, remains the most commonly used method; however, their efficacy is limited.<sup>23</sup> People who develop early-onset AUD historically are not helped by counselling, exhibit anti-social behaviour, and have a high relapse rate when they attempt to stop drinking.<sup>24</sup> Ondansetron has been shown to reduce alcohol use in animal models and has the potential to reduce alcohol consumption in humans.<sup>25</sup> Studies have reported that ondansetron reduces alcohol-induced positive subjective effects and alcohol preference.<sup>26-28</sup> If licenced, ondansetron will offer an additional treatment option for people with AUD.

### Regulatory & Development Status

Ondansetron is licensed in the UK for the following indications:<sup>2</sup>

- For the management of nausea and vomiting induced by cytotoxic chemotherapy and radiotherapy, and for the prevention and treatment of post-operative nausea and vomiting (PONV) in adults
- For the management of chemotherapy-induced nausea and vomiting in children aged  $\geq 6$  months, and for the prevention and treatment of PONV in children aged  $\geq 1$  month

Ondansetron is in phase II/III development for a number of indications, some of which include:<sup>29</sup>

- Gastroenteritis
- Sleep syncope
- Indigestion
- Sepsis

## Patient Group

### Disease Area and Clinical Need

AUD, which is also called alcohol misuse, occurs when one drinks in a way that is harmful, or when one is dependent on alcohol.<sup>30-32</sup> AUD is marked by uncontrolled drinking behaviour, and some of the risk factors for AUD include; family history of AUD, drinking at an early age, and other socio-economic factors arising from the loss of a job, housing, or a loved one.<sup>33-36</sup> AUD presents several risks that can be short- or long-term risks. The short-term risks include accidents and injuries, violent behaviours and being victims of such violence, loss of personal possessions, alcohol intoxication and the infection with sexually transmitted diseases through engaging in unprotected sex. Long-term risks of AUD include stroke, liver cancer, bowel cancer, breast cancer, pancreatitis, mouth cancer, heart disease, liver disease and brain damage.<sup>30</sup>

AUD accounts for approximately 5.3% and 5.1%, of global mortality and morbidity respectively.<sup>7</sup> In England, 4% of those aged between 16 and 65 are dependent on alcohol (6% of men and 2% of women), with more than 24% of the English population consuming alcohol in a way that is harmful to their health or well-being.<sup>37</sup> There were 17,040, (equating 10.8 deaths per 100,000) alcohol-specific deaths in England between 2016 and 2018 while in 2018 alone, an estimated 24,720 alcohol-related deaths (equating 46.5 deaths per 100,000) were reported in England.<sup>38</sup> In England (2021-22), there were 68,236 finished consultant episodes (FCEs) and 38,753 admissions for mental and behavioural disorders due to use of alcohol (ICD-10 code F10). This resulted in 60 day cases and 182,864 FCE bed days.<sup>39</sup>

#### Recommended Treatment Options

The National Institute for Health and Care Excellence (NICE) currently recommends the following pharmacological treatment options for AUD (assisted withdrawal):<sup>37</sup> Benzodiazepine (chlordiazepoxide or diazepam), except in cases of liver impairment.

NICE also recommends the following pharmacological treatment options for moderate and severe alcohol dependence following successful withdrawal:<sup>37</sup>

- Acamprosate or oral naltrexone in combination with a psychological intervention
- Disulfiram in combination with a psychological intervention

#### Clinical Trial Information

<p>Trial</p>	<p><b>ONWARD</b>; <a href="#">NCT04101227</a>, <a href="#">EudraCT 2019-000737-39</a>; Study to Evaluate the Efficacy, Safety and Tolerability of AD04 (Ondansetron) in Adults With Alcohol Use Disorder (AUD) and Selected Polymorphisms in the Serotonin Transporter and Receptor Genes.  <b>Phase III</b> – Completed  <b>Location(s)</b>: Seven EU countries  <b>Study completion date</b>: March 2022</p>
<p>Trial Design</p>	<p>Randomised, parallel-assignment, quadruple-blinded, placebo-controlled</p>
<p>Population</p>	<p>N= 302 (actual); adults of age 18 years and above who have moderate to severe diagnosis of AUD as measured by Diagnostic and Statistical Manual of Mental Disorders, 5th Edition (DSM-5) criteria</p>
<p>Intervention(s)</p>	<ul style="list-style-type: none"> <li>• Oral ondansetron 0.33 mg twice a day</li> <li>• Companion diagnostic for genetic testing</li> <li>• Brief psychological counselling</li> </ul>
<p>Comparator(s)</p>	<ul style="list-style-type: none"> <li>• Matching placebo orally administered twice a day</li> <li>• Companion diagnostic for genetic testing</li> </ul>

	<ul style="list-style-type: none"> <li>Brief psychological counselling</li> </ul>
Outcome(s)	<p><b>Primary outcome measure:</b> Change from baseline in the percentage of monthly heavy drinking days [Time frame: weeks 16 to 24]</p> <p>See trial record for a full list of other outcomes.</p>
Results (efficacy)	<ul style="list-style-type: none"> <li>Ondansetron demonstrated statistically significant difference in AUD severity, as compared to placebo, with an 84% decrease in the number of heavy drinking patients meeting the criteria for AUD diagnosis.<sup>40</sup></li> <li>Ondansetron achieved a statistically significant mean reduction in heavy drinking days among pre-specified group of heavy drinkers, compared to placebo, with an approximately 79% reduction from baseline drinking.<sup>40</sup></li> </ul>
Results (safety)	<ul style="list-style-type: none"> <li>No serious adverse events (SAEs) were determined to be related to ondansetron treatment.<sup>40</sup></li> <li>More SAEs were reported in the placebo group compared with the ondansetron group (7 on placebo vs. 3 on ondansetron).<sup>40</sup></li> </ul>

### Estimated Cost

Ondansetron is already marketed in the UK; 10 tablets of 4 mg ondansetron cost £9.00 according to the National Health Service (NHS) indicative price.<sup>41</sup>

### Relevant Guidance

#### NICE Guidance

- NICE technology appraisal. Nalmefene for reducing alcohol consumption in people with alcohol dependence (TA325). November 2014.
- NICE clinical guideline. Alcohol-use disorders: diagnosis, assessment and management of harmful drinking (high-risk drinking) and alcohol dependence (CG115). February 2011.
- NICE clinical guideline. Alcohol-use disorders: diagnosis and management of physical complications (CG100). April 2017.
- NICE quality standard in development. Alcohol-use disorders update (GID-QS10164). Expected July 2023.
- NICE quality standard. Alcohol-use disorders: diagnosis and management (QS11). August 2011.

#### NHS England (Policy/Commissioning) Guidance

No relevant guidance identified.

#### Other Guidance

- University Hospital Sussex NHS Foundation Trust. Alcohol Withdrawal Syndrome: Management guidelines for adults. 2021.<sup>42</sup>

### Additional Information

Adial Pharmaceuticals are yet to enter information about this technology onto the UK PharmaScan database, which serves as the primary source of information for UK horizon scanning organisations on new medicines in development. As a result, the NIHR Innovation Observatory has had to obtain data from other sources. UK PharmaScan is an essential tool to support effective NHS forward planning; allowing more effective decision making and faster uptake of innovative new medicines for patients who could benefit. We urge pharmaceutical companies to use UK PharmaScan so that we can be assured of up-to-date, accurate and comprehensive information on new medicines.

## References

- 1 Clinicaltrials.gov. *Study to Evaluate AD04 in Adults With Alcohol Use Disorder (AUD) and Selected Serotonin Transporter Polymorphisms (ONWARD)*. Trial ID: NCT04101227. 2019. Status: Completed. Available from: <https://clinicaltrials.gov/ct2/show/NCT04101227> [Accessed 28 March 2023].
- 2 Electronic Medicines Compendium (EMC). *Ondansetron 4 mg film-coated tablets*. 2023. Available from: <https://www.medicines.org.uk/emc/product/5222/smpc#ref> [Accessed 19 April 2023].
- 3 Walstab J, Rappold G, Niesler B. 5-HT<sub>3</sub> receptors: role in disease and target of drugs. *Pharmacology and Therapeutics*. 2010;128(1):146-69. Available from: <https://doi.org/10.1016/j.pharmthera.2010.07.001>.
- 4 Lovinger DM. 5-HT<sub>3</sub> receptors and the neural actions of alcohols: an increasingly exciting topic. *Neurochemistry International*. 1999;35(2):125-30. Available from: [https://doi.org/10.1016/s0197-0186\(99\)00054-6](https://doi.org/10.1016/s0197-0186(99)00054-6).
- 5 Zhou Q, Lovinger DM. Pharmacologic characteristics of potentiation of 5-HT<sub>3</sub> receptors by alcohols and diethyl ether in NCB-20 neuroblastoma cells. *Journal of Pharmacology and Experimental Therapeutics*. 1996;278(2):732-40. <https://jpet.aspetjournals.org/content/jpet/278/2/732.full.pdf>.
- 6 Johnson BA, Roache JD, Javors MA, DiClemente CC, Cloninger CR, Prihoda TJ, et al. Ondansetron for Reduction of Drinking Among Biologically Predisposed Alcoholic Patients: A Randomized Controlled Trial. *JAMA*. 2000;284(8):963-71. Available from: <https://doi.org/10.1001/jama.284.8.963>.
- 7 Koob GF. Neural mechanisms of drug reinforcement. *Annals of the New York Academy of Sciences*. 1992;654:171-91. Available from: <https://doi.org/10.1111/j.1749-6632.1992.tb25966.x>.
- 8 Di Chiara G, Imperato A. Drugs abused by humans preferentially increase synaptic dopamine concentrations in the mesolimbic system of freely moving rats. *Proceedings of the National Academy of Sciences of the United States of America*. 1988;85(14):5274-8. Available from: <https://doi.org/10.1073/pnas.85.14.5274>.
- 9 Wise RA, & Bozarth, M. A. A psychomotor stimulant theory of addiction. In: Johnson BA, Roache JD, Javors MA, et al. Ondansetron for Reduction of Drinking Among Biologically Predisposed Alcoholic Patients: A Randomized Controlled Trial. *JAMA*. 2000;284(8):963-71. Available from: <https://doi.org/10.1001/jama.284.8.963>.
- 10 Hemby SE, Johnson BA, Dworkin SI. Neurobiological basis of drug reinforcement. In: Johnson BA, Roache JD, Javors MA, et al. Ondansetron for Reduction of Drinking Among Biologically Predisposed Alcoholic Patients: A Randomized Controlled Trial. *JAMA*. 2000;284(8):963-71. Available from: <https://doi.org/10.1001/jama.284.8.963>.
- 11 Bloom FE, Morales M. The Central 5-HT<sub>3</sub> Receptor in CNS Disorders. *Neurochemical Research*. 1998;23(5):653-9. Available from: <https://doi.org/10.1023/A:1022486705184>.

- 12 Kilpatrick GJ, Jones BJ, Tyers MB. Identification and distribution of 5-HT<sub>3</sub> receptors in rat brain using radioligand binding. *Nature*. 1987;330(6150):746-8. Available from: <https://doi.org/10.1038/330746a0>.
- 13 Kilpatrick GJ, Hagan RM, Gale JD. 5-HT<sub>3</sub> and 5-HT<sub>4</sub> receptors in terminal regions of the mesolimbic system. *Behavioural Brain Research*. 1996;73(1-2):11-3. Available from: [https://doi.org/10.1016/0166-4328\(96\)00063-0](https://doi.org/10.1016/0166-4328(96)00063-0).
- 14 Costall B, Domeney AM, Naylor RJ, Tyers MB. Effects of the 5-HT<sub>3</sub> receptor antagonist, GR38032F, on raised dopaminergic activity in the mesolimbic system of the rat and marmoset brain. *British Journal of Pharmacology*. 1987;92(4):881-94. Available from: <https://doi.org/10.1111/j.1476-5381.1987.tb11394.x>.
- 15 Hodge CW, Samson HH, Lewis RS, Erickson HL. Specific decreases in ethanol- but not water-reinforced responding produced by the 5-HT<sub>3</sub> antagonist ICS 205-930. *Alcohol*. 1993;10(3):191-6. Available from: [https://doi.org/https://doi.org/10.1016/0741-8329\(93\)90034-L](https://doi.org/https://doi.org/10.1016/0741-8329(93)90034-L).
- 16 Fadda F, Garau B, Marchei F, Colombo G, Gessa GL. MDL 72222, a selective 5-HT<sub>3</sub> receptor antagonist, suppresses voluntary ethanol consumption in alcohol-preferring rats. *Alcohol and Alcoholism*. 1991;26(2):107-10. Available from: <https://doi.org/10.1093/oxfordjournals.alcalc.a045088>.
- 17 Rodd-Henricks ZA MD, Li TK, Crile RS, Murphy JM, McBride WJ. Intracranial Self-Administration of Ethanol Into the Posterior VTA of Wistar Rats is Mediated by 5-HT<sub>3</sub> Receptors. In: Johnson BA, Roache JD, Javors MA, et al. Ondansetron for Reduction of Drinking Among Biologically Predisposed Alcoholic Patients: A Randomized Controlled Trial. *JAMA*. 2000;284(8):963-71. Available from: <https://doi.org/10.1001/jama.284.8.963>.
- 18 MEERT TF. EFFECTS OF VARIOUS SEROTONERGIC AGENTS ON ALCOHOL INTAKE AND ALCOHOL PREFERENCE IN WISTAR RATS SELECTED AT TWO DIFFERENT LEVELS OF ALCOHOL PREFERENCE. *Alcohol and Alcoholism*. 1993;28(2):157-70. Available from: <https://doi.org/10.1093/oxfordjournals.alcalc.a045356>.
- 19 McBride WJ, Li TK. Animal models of alcoholism: neurobiology of high alcohol-drinking behavior in rodents. *Critical Reviews in Neurobiology*. 1998;12(4):339-69. Available from: <https://doi.org/10.1615/critrevneurobiol.v12.i4.40>.
- 20 Tomkins DM, Le AD, Sellers EM. Effect of the 5-HT<sub>3</sub> antagonist ondansetron on voluntary ethanol intake in rats and mice maintained on a limited access procedure. *Psychopharmacology*. 1995;117(4):479-85. Available from: <https://doi.org/10.1007/BF02246222>.
- 21 Barnes NM, Sharp T. A review of central 5-HT receptors and their function. *Neuropharmacology*. 1999;38(8):1083-152. Available from: [https://doi.org/https://doi.org/10.1016/S0028-3908\(99\)00010-6](https://doi.org/https://doi.org/10.1016/S0028-3908(99)00010-6).
- 22 Beardsley PM, Lopez OT, Gullikson G, Flynn D. Serotonin 5-HT<sub>3</sub> antagonists fail to affect ethanol self-administration of rats. *Alcohol*. 1994;11(5):389-95. Available from: [https://doi.org/https://doi.org/10.1016/0741-8329\(94\)90023-X](https://doi.org/https://doi.org/10.1016/0741-8329(94)90023-X).
- 23 Lohoff FW. Targeting Unmet Clinical Needs in the Treatment of Alcohol Use Disorder. *Front Psychiatry*. 2022;13:767506. Available from: <https://doi.org/10.3389/fpsy.2022.767506>.
- 24 Very Well Mind. *Ondansetron May Reduce Alcohol Craving*. 2021. Available from: <https://www.verywellmind.com/ondansetron-may-reduce-alcohol-craving-63397> [Accessed 19 April 2023].
- 25 Sherwood Brown E, McArdle M, Palka J, Bice C, Ivleva E, Nakamura A, et al. A randomized, double-blind, placebo-controlled proof-of-concept study of ondansetron for bipolar and related disorders and alcohol use disorder. *European Neuropsychopharmacology*. 2021;43:92-101. Available from: <https://doi.org/https://doi.org/10.1016/j.euroneuro.2020.12.006>.

- 26 Corrêa Filho JM, Baltieri DA. A pilot study of full-dose ondansetron to treat heavy-drinking men withdrawing from alcohol in Brazil. *Addictive Behaviors*. 2013;38(4):2044-51. Available from: <https://doi.org/10.1016/j.addbeh.2012.12.018>.
- 27 Myrick H, Anton RF, Li X, Henderson S, Randall PK, Voronin K. Effect of Naltrexone and Ondansetron on Alcohol Cue-Induced Activation of the Ventral Striatum in Alcohol-Dependent People. *Archives of General Psychiatry*. 2008;65(4):466-75. Available from: <https://doi.org/10.1001/archpsyc.65.4.466>.
- 28 McBride WJ, Lovinger DM, Machu T, Thielen RJ, Rodd ZA, Murphy JM, et al. Serotonin-3 receptors in the actions of alcohol, alcohol reinforcement, and alcoholism. *Alcoholism: Clinical and Experimental Research*. 2004;28(2):257-67. Available from: <https://doi.org/https://doi.org/10.1097/01.ALC.0000113419.99915.DA>.
- 29 ClinicalTrials.gov. *Ondansetron | Recruiting, Not yet recruiting, Active, not recruiting, Enrolling by invitation Studies | Phase 2, 3*. 2023. Available from: [https://clinicaltrials.gov/ct2/results?cond=&term=Ondansetron&type=&rslt=&recrs=b&recrs=a&recrs=f&recrs=d&age\\_v=&gndr=&intr=&titles=&outc=&spons=&lead=&id=&cntry=&state=&city=&dist=&locn=&phase=1&phase=2&rsub=&strd\\_s=&strd\\_e=&prcd\\_s=&prcd\\_e=&sfpd\\_s=&sfpd\\_e=&rfpd\\_s=&rfpd\\_e=&lupd\\_s=&lupd\\_e=&sort=](https://clinicaltrials.gov/ct2/results?cond=&term=Ondansetron&type=&rslt=&recrs=b&recrs=a&recrs=f&recrs=d&age_v=&gndr=&intr=&titles=&outc=&spons=&lead=&id=&cntry=&state=&city=&dist=&locn=&phase=1&phase=2&rsub=&strd_s=&strd_e=&prcd_s=&prcd_e=&sfpd_s=&sfpd_e=&rfpd_s=&rfpd_e=&lupd_s=&lupd_e=&sort=) [Accessed 19 April 2023].
- 30 National Health Service (NHS). *Alcohol misuse*. 2022. Available from: <https://www.nhs.uk/conditions/alcohol-misuse/> [Accessed 04 April 2023].
- 31 Medical News Today. *What to know about alcohol use disorder*. 2022. Available from: <https://www.medicalnewstoday.com/articles/alcohol-abuse> [Accessed 04 April 2023].
- 32 Carvalho AF, Heilig M, Perez A, Probst C, Rehm J. Alcohol use disorders. *The Lancet*. 2019;394(10200):781-92. Available from: [https://doi.org/https://doi.org/10.1016/S0140-6736\(19\)31775-1](https://doi.org/https://doi.org/10.1016/S0140-6736(19)31775-1).
- 33 World Health Organization (WHO). *Alcohol*. 2022. Available from: <https://www.who.int/news-room/fact-sheets/detail/alcohol> [Accessed 14 April 2023].
- 34 Addiction Group. *Causes of Alcohol Use Disorder (AUD)*. 2023. Available from: <https://www.addictiongroup.org/alcohol/addiction/causes/> [Accessed 04 April 2023].
- 35 Insider. *Is alcohol use disorder genetic? How having a relative with AUD predisposes you to developing it*. 2021. Available from: <https://www.insider.com/guides/health/mental-health/is-alcoholism-genetic#:~:text=1%20Parents%20with%20alcohol%20use%20disorder%20%28AUD%29%20are,drinking%20at%20an%20early%20age%2C%20or%20experiencing%20trauma>. [Accessed 16 May, 2023].
- 36 Collins SE. Associations Between Socioeconomic Factors and Alcohol Outcomes. *Alcohol Res*. 2016;38(1):83-94.
- 37 National Institute for Health and Care Excellence (NICE). *Alcohol-use disorders: diagnosis, assessment and management of harmful drinking (high-risk drinking) and alcohol dependence (CG115)*. Available from: <https://www.nice.org.uk/guidance/CG115> [Accessed 14 April 2023].
- 38 Public Health England. *Local Alcohol Profiles for England: short statistical commentary, January 2020*. 2020. Available from: <https://www.gov.uk/government/statistics/local-alcohol-profiles-for-england-january-2020-data-update/local-alcohol-profiles-for-england-short-statistical-commentary-january-2020> [Accessed 14 April 2023].
- 39 National Health Service (NHS) 75 Digital. *Hospital Admitted Patient Care Activity, 2021-22*. 2022. Available from: <https://digital.nhs.uk/data-and-information/publications/statistical/hospital-admitted-patient-care-activity/2021-22> [Accessed 19 April 2023].
- 40 Adial Pharmaceuticals. *Adial Pharmaceuticals Announces Topline Results For Onward™ Phase 3 Trial for AD04 in Patients with Alcohol Use Disorder*. 2022. Available from:

- <https://www.adial.com/adial-pharmaceuticals-announces-topline-results-for-onward-phase-3-trial-for-ad04-in-patients-with-alcohol-use-disorder/> [Accessed 04 April 2023].
- 41 National Institute for Health and Care Excellence (NICE) - British National Formulary (BNF). *Medical Forms - Ondansetron*. 2023. Available from: <https://bnf.nice.org.uk/drugs/ondansetron/medicinal-forms/> [Accessed 19 April 2023].
- 42 University Hospitals Sussex NHS Foundation Trust. *Alcohol Withdrawal Syndrome: Management guidelines for adult*. 2021. Available from: <https://www.bsuh.nhs.uk/library/wp-content/uploads/sites/8/2021/11/Alcohol-withdrawal-guideline-November-2021-Final.pdf> [Accessed 14 April 2023].

**NB: This briefing presents independent research funded by the National Institute for Health and Care Research (NIHR). The views expressed are those of the author and not necessarily those of the NHS, the NIHR or the Department of Health.**