



# British Healthcare Trades Association

## Policy update 2026



Building a resilient, innovative and ethical health tech future

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# Executive summary

## The UK's health system is entering a decisive decade.

The [NHS 10-Year Plan \(2025\)](#) and the [UK Life Sciences Sector Plan \(2025\)](#) both aim to transform how care is delivered, innovated, and sustained. They prioritise integration across health and social care, digitalisation of services, rapid adoption of technology, and stronger partnerships with ethical industry providers. The [British Healthcare Trades Association \(BHTA\)](#) and its members—manufacturers, distributors, and service providers across assistive and medical technologies—stand ready to deliver on this agenda. With over a century of trusted leadership and the only [CTSI-approved Code of Practice in med tech](#), the BHTA ensures quality, fairness, and protection for consumers while enabling business growth and regulatory compliance.

Since the publication of the BHTA 2023-24 Manifesto, BHTA is thrilled to see several of its “Five Rs” recommendations for improving UK health & social care (H&SC) take shape in the form of initiatives from Government and key stakeholders DBT, DHSC, MHRA,

NHS, NHSE, NICE, OLS, and others (for a detailed review, please see [Annex 1 - BHTA 2023-24 Manifesto Recap](#))

BHTA's “Five Rs” recommendations remain as relevant now as when they were first published. The BHTA 2025-26 Policy Update aims to advance those recommendations with concrete priorities and actions – and accounts for changes and developments over an eventful last two years. BHTA calls for a collaborative approach between Government, the NHS (and other key stakeholders), and industry to deliver better outcomes, faster innovation, and sustainable systems through five suggested priorities and twenty-five actions.



**The BHTA ensures quality, fairness, and protection for consumers while enabling business growth and regulatory compliance**



# 1. Free NHS capacity through partnership and prevention

## Goal

Support the NHS's move from reactive to preventative care by embedding assistive technology, community-based solutions, and ethical provision.

## Context

The **NHS 10-Year Plan (2025)** aims to shift 30% of hospital-based care into community and digital settings, and the **UK Life Sciences Sector Plan (2025)** aims to make the UK a premier health tech investment hub. To succeed, the NHS must engage trusted partners who can deliver safe, effective, and scalable technologies.

## Priorities

1. **National Community Partnership Framework:** Build collaboration between NHS, local authorities, and BHTA members to expand rapid discharge, telemonitoring, and home adaptation services.
2. **Community Capacity Accelerator:** Pilot programmes demonstrating how assistive technology reduces length of stay, prevents readmission, and lowers care costs.
3. **Ethical Supply Chain Integration:** Require procurement partners to adhere to BHTA's Code of Practice, ensuring fair, transparent treatment of vulnerable consumers.
4. **Prevention-Focused Contracts:** Embed outcome measures like independence gained and falls prevented in all ICS procurement.
5. **Digitally Enabled Self-Management:** Scale remote support tools and patient education initiatives co-designed with clinicians and patients.

# 30%

of hospital-based care to shift into the community and digital settings



# Spotlight 1:

## NHS 10 Year Plan

**BHTA members or other interested parties can request BHTA's detailed analysis of the NHS 10 Year Plan by writing to [bhta@bhta.com](mailto:bhta@bhta.com)**

A high-level summary includes:

### Three big shifts ...

- From hospital to community
- From analogue to digital
- From sickness to prevention

### ... across three workstreams ...

- Neighbourhood care
- Digital enablement
- Preventative health

### ... that aim to change NHS ways of working ...

- A new operating model to drive devolution
- A new workforce model keyed to better value and outcomes
- An embrace of partnerships

### ... assisted by 5 tech big bets

- Data to deliver impact
- Ai to drive productivity
- Genomics and predictive analysis
- Wearables to make care 'real time'
- Robotics to support precision

# Spotlight 2:

## Life Sciences Sector Plan

**BHTA members or other interested parties can request BHTA's detailed analysis of the UK Life Sciences Sector Plan by writing to [bhta@bhta.com](mailto:bhta@bhta.com)**

A high-level summary includes:

### Three core pillars ...

- Enable world-class R&D, strengthening the UK's leadership in science and discovery
- Make the UK outstanding, as a place to start, scale, and invest
- Drive health innovation and NHS reform, to deliver better outcomes for patients and a more modern, preventative healthcare system

### ... to enable six actions ...

- Establish a Health Data Research Service (HDRS)
- Cut trial approval
- Invest up to £250 million in manufacturing
- Accelerate regulation and market access
- Simplify NHS procurement
- Partner strategically with industry

### Possible implications for BHTA Members (Including CES)

- Shift to community-based care
- Digital and wearable tech
- NHS innovator passport
- Right product, right price, right place
- Design for life roadmap
- Possible new funding routes

# 2. A progressive regulatory framework for safe, fast innovation

## Goal

Implement a modern regulatory model that protects patients, promotes innovation, and enables UK and global market competitiveness.

## Context

The [Medical Devices \(Post-market Surveillance Requirements\) \(Amendment\) \(Great Britain\) Regulations 2024](#) and [associated regulatory guidance](#) reinforce obligations for safety monitoring, traceability, and vigilance reporting. Meanwhile, the UK aligns more closely with global frameworks through the [Life Sciences Sector Plan](#).

## Priorities

6. **PMS Readiness Clinics:** Deliver regulator-industry training for SMEs on compliance and incident management.
7. **Digital Traceability:** Implement full-device traceability across supply chains using unique device identifiers (UDI).
8. **Regulatory Convergence:** Maintain CE recognition for dual-marked devices and expand mutual recognition with trusted global regulators.
9. **Data Interoperability Hub:** Support the MHRA and NHS in creating real-time reporting systems for safety, performance, and market surveillance.
10. **Transparent Guidance Library:** Establish an open-access repository for regulatory updates, classification precedents, and best practices.

# Spotlight 3:

## MHRA

**In 2024-2025 MHRA advanced a major overhaul of the UK medical device regulatory framework, marking some of the most substantive updates since the UK left the EU.**

The most significant legislative change was the Medical Devices (Post-market Surveillance Requirements) (Amendment) (Great Britain) Regulations 2024, which were laid in Parliament in late 2024 and came into force on 16 June 2025. These reforms strengthened post-market surveillance (PMS) obligations, requiring manufacturers to implement enhanced incident data collection, tightened serious incident reporting timelines, mandatory PMS plans and more rigorous periodic trend reviews to improve patient safety across devices in Great Britain.

Alongside PMS changes, **MHRA progressed consultations on core pre-market reforms.** A consultation on “Routes to market and in vitro diagnostic devices” ran from November 2024 to January 2025, with the **government response published in July 2025.** These pre-market proposals aim to modernise device classification (including for software and implantables), refine technical documentation requirements, align aspects of UK rules with international frameworks, and establish **international recognition schemes** that could allow devices approved by certain **comparable regulators (e.g., EU, US, Canada, Australia)** to access the UK market under defined conditions.

Under **MHRA’s evolving roadmap**, their **core pre-market statutory instrument (SI)** – often called the Pre-Market SI – is being developed and is expected to be **notified on the World Trade Organization (WTO) website before parliamentary scrutiny.** WTO notification is a formal requirement for opening up draft UK regulations to international comment prior to enactment, and it sets the stage

for these pre-market rules to be debated and made law, with implementation targeted for **2026.**

A notable element of the July 2025 consultation response was MHRA’s **intention to consult further later in 2025 [now 2026] on the indefinite recognition of EU CE-marked devices in Great Britain.** Earlier transitional arrangements permit CE-marked medical devices to be placed on the UK market until 2028-2030 depending on the device type; the agency is now considering whether indefinite CE mark recognition – beyond those sunset dates – should be introduced. This additional consultation will explore how such recognition could operate alongside international reliance routes and existing UK requirements.



**Mandatory PMS plans and more rigorous periodic trend reviews to improve patient safety across devices in Great Britain.**

# Spotlight 4:

## NICE

**In 2024-2025, NICE significantly expanded its role in the UK medical device and HealthTech regulatory landscape, emerging as a key stakeholder alongside the MHRA and NHS in shaping how innovative technologies are evaluated and adopted within the NHS.**

Traditionally known for health technology assessment and clinical guidelines, NICE's remit is now being extended to support the government's **MedTech strategy** and regulatory reforms that aim to streamline innovation pathways from device development to NHS uptake. As part of this, DHSC commissioned NICE to undertake **late-stage assessments (LSAs)** of existing medical technology categories – a process designed to evaluate technologies later in their lifecycle to inform NHS adoption and reimbursement decisions. The interim methods and process for these LSAs were developed following a public consultation in early 2024, drawing input from industry, professional bodies, and other stakeholders, and revised with the aim of ensuring robust, transparent evaluation

methodologies tailored to the unique challenges of later-stage device assessment. NICE delivered draft guidance on initial LSA topics in spring 2025, and **NICE will move on to more LSA topics across 2026.**

Concurrently, **NICE proposed broader HealthTech programme reforms throughout 2025.** These reforms include merging multiple evaluation programmes into a single lifecycle-oriented approach, enabling assessment of technologies at any stage – from early promising innovations to established products already in use – and reducing barriers such as the historical requirement for devices to demonstrate outright cost savings before recommendation. This shift aligns NICE more closely with the government's ambition to foster innovation adoption and broader NHS access to effective medical technologies.

The **elevated role of NICE reflects a strategic recognition** that regulatory frameworks and health technology assessments must work in tandem to deliver faster and fairer access to high-impact devices and diagnostics. By integrating late-stage assessments, lifecycle evaluation and collaboration with regulatory reforms led by MHRA, NICE has positioned itself as a central player in ensuring safe, effective, and value-driven medical device regulation and adoption across the UK health system.



**Traditionally known for health technology assessment and clinical guidelines, NICE's remit is now being extended to support the government's MedTech strategy**

# 3. Accelerating innovation adoption and value-based procurement

## Goal

Ensure every proven innovation reaches patients faster through unified innovation entry points and outcome-based evaluation.

## Context

The **Life Sciences Sector Plan (2025)** calls for “Discovery-to-Adoption” reform—turning research excellence into widespread clinical use. The **NHS Innovation Service** must simplify access, evaluation, and scale-up for innovators.

## Priorities

11. **Unified Innovation Office:** Merge disparate innovation portals into one national entry system with transparent evaluation timelines.
12. **Pilot-to-Procure Pathways:** Automatically scale successful NHS pilots with predefined outcome criteria.
13. **Value-Based Procurement (VBP):** Make outcomes, total cost of ownership, and inclusion criteria central to all tenders.
14. **SME Innovation Lots:** Create dedicated NHS framework categories for small innovators to enter supply chains.
15. **Health Inequalities & Inclusion Board:** Evaluate new technologies against equity and accessibility metrics.



# 4. Embedding sustainability and social value

## Goal

Integrate net-zero and social value goals into all procurement without disadvantaging SMEs.

## Context

The **NHS Social Value Model (2025)** mandates a minimum 10% weighting for sustainability and community benefit in tenders. Assistive technology must align through circular design, reuse, and low-carbon manufacturing.

## Priorities

16. **Sector Playbooks:** Develop NHS Category Playbooks with BHTA input covering carbon metrics, materials, and lifecycle costing.
17. **SME Support Toolkit:** Provide practical templates for carbon reporting, circular design, and modern slavery compliance.
18. **Reuse & Refurbishment Standards:** Nationally standardise community equipment reuse for cost and carbon savings.
19. **Carbon-in-Use Metrics:** Incorporate operational emissions into procurement scoring and clinical guidance.
20. **Transparent Social Value Index:** Publish annual performance data for accountability and consistency.



# Spotlight 5: Community equipment services (CES)

APPG report  
survey received  
**626**  
responses

**BHTA is incredibly proud to have partnered with Newlife and Tendo Consulting to help launch a new All-Party Parliamentary Group (APPG) for Access to Disability Equipment in 2025.**

As the first point of focus for the APPG, Parliamentarians chose CES provision in the UK – a topic that is shot through with issues of sustainability and social value in particular, as well as structural challenges around CES provision in general. Please see the [APPG website](#) for the APPG's first report, [Barriers to Accessing Lifesaving Disability Equipment](#), including an [executive summary](#).

Highlights include:

## Headline Statistics

The report, *Barriers to Accessing Lifesaving Disability equipment*, found that:

**55%**

of equipment users do not have the medical equipment they need for their long-term needs

**63%**

of carers and 55% of users say services are getting worse

**74%**

of equipment providers said they were aware of patients experiencing delayed hospital discharge

**44%**

of equipment providers say community equipment provision is "not at all consistent and equitable"

## Patient and Carer Experience

Current system is not meeting patient needs and expectations

- **63%** of carers and 55% of equipment users said that services are getting worse
- **55%** of equipment users reported that they do not have access to the medical equipment they need for their long-term needs
- Widespread reports of users being let down by the current system
- Many families reported having to purchase their own equipment
- Many equipment users say they are offered the "bare minimum"

## Recommendations

- National CES Strategy
- Funding Reforms
- Tackling Waiting Times & Delays
- Improved Communications Channels
- National Advisory Board
- Reuse & Recycling Programme

# 5. Strengthening UK exports and global competitiveness

## Goal

Position UK HealthTech as a trusted global leader through stable trade policies, export finance, and regulatory recognition.

## Context

Post-Brexit complexities and delays in digital border systems challenge SMEs. Yet global demand for ethical, high-quality health and assistive technology continues to grow.

## Priorities

21. **HealthTech Export Playbook:** Produce comprehensive guidance on market access, logistics, and trade compliance.
22. **Global Trade Missions:** Partner with DBT to showcase UK innovation in emerging markets.
23. **Export Finance Expansion:** Tailor financial instruments to assistive technology firms with long lifecycle products.
24. **Dual Compliance Pathways:** Support dual CE/UKCA strategies with clear transition timelines.
25. **Border & Data Coordination Forum:** Work with HMRC to streamline customs data requirements and digital border readiness.



# Spotlight 6:

## Trade association commitment to UK export strategy

**In its mission to create an environment where it is safe, efficient, and economically beneficial for UK health tech companies to export goods and services to the wider world, BHTA is privileged to work alongside other UK trade associations with a wealth of experience and perspective.**

We would highlight the 2025 publication of our colleagues at the Association of British HealthTech Industries (ABHI) as emblematic of the kind of detailed Government/industry partnership plans that would benefit our sector.

The [Imperial College London / ABHI joint report "Health, Wealth and Growth: The UK HealthTech](#)

[Sector" \(2025\)](#) lays out a comprehensive plan to expand global opportunities for UK HealthTech exporters. At its core, the report identifies that while the UK excels in HealthTech innovation, it currently captures little of the global economic benefit – ranking **30th out of 31 European countries** for medical device trade balance with a **£4.5 billion deficit**. Only **3% of the world's HealthTech market** lies within the UK, meaning international growth is essential for attracting investment and sustaining high-value jobs.

To address this, the report proposes creating a **HealthTech Global Export Programme**, expanding upon ABHI's successful **US Export Accelerator**. The new **Global Export Programme** will be **industry-led by ABHI** with government backing, and will focus on:

# 1

### **Sector expert partnership -**

embedding HealthTech specialists to support the Department for Business and Trade (DBT) and embassies with targeted market advice.

# 2

### **Expanded US**

**accelerator** - adding at least two new US states with high growth potential.

# 3

### **Global market**

**launches** - extending trade missions and partnerships to the **Middle East and Asia**, building on ABHI's presence at *Arab Health*.

# 4

### **Sector export**

**alumni community** - creating a peer network of UK exporters to share experience and reliable international contacts.

# Annex 1

## BHTA 2023-24

### manifesto recap

#### **The UK's manufacturers, distributors, and retailers of Health Technology (Health Tech) for Health and Social Care (H&SC) are already key contributors to the UK economy.**

They provide goods and services worth £4bn per year and are a critical part of the broader H&SC sector. Without a vibrant and healthy H&SC sector, the UK will flounder and will not be able to deliver the reforms to health and social care that are urgently needed to ensure it is fit for purpose.

Despite the Health Tech sector brimming with a collaborative spirit and innovations that could greatly benefit the NHS, industry's contributions frequently fail to gain traction. This is particularly challenging for smaller businesses whose groundbreaking innovations risk fading into obscurity due to systemic issues. The untapped potential of these ideas, hindered by existing barriers, highlights the urgency for a collaborative approach. It's time to bridge the gap, fostering a partnership that empowers UK Health Tech industry to bring forward its transformative solutions, catalysing positive change within the healthcare landscape.

At the heart of this manifesto are five key recommendations which, if implemented, would empower the vital H&SC sector to help with key challenges in the NHS, social care and support a thriving UK Health Tech sector:

**1** Release NHS Capacity - Industry Partnership for Effective H&SC Delivery: By bringing all stakeholders together - including industry partners - significant progress could be made to release additional NHS capacity and reduce hospital admissions. We urge the establishment of a National H&SC Stakeholder Forum where scalable solutions and practices can be quickly identified and rolled out.

**2** Regulate for Safe, Effective UK Medical Devices: To ensure access to safe, effective medical devices - and a domestic industry that delivers patient innovations - the UK needs a world-leading medical device regime.

**3** Rethink Innovation Adoption & Procurement: The UK needs a unified innovation office (a "single front door") led by DHSC. This must include reform to H&SC procurement processes, making better use of value-based procurement principles to ensure adoption of the right products at the right time and deliver the best patient outcome at the best value.

**4** Regularise Sustainability & Social Value: Government must empower NHSE Central Commercial Function (CCF) with budget, resource, and authority to drive consistency in sustainability and social value across departments and commissioning bodies.

**5** Reduce Export Barriers: The UK needs consistent, frictionless trade, yet export barriers threaten UK Health Tech's global potential. In close partnership with industry, Government should ensure clear, consistent application of the 2025 UK Border Strategy, UK Export Strategy, and UK Single-Trade Window.

# Conclusion

**BHTA and its members play a pivotal role in delivering the UK's vision for a digitally enabled, community-driven, and sustainable healthcare system.**

By aligning ethical business practices with regulatory excellence and innovation delivery, the UK can achieve a resilient and equitable health ecosystem.



[www.bhta.com](http://www.bhta.com)



**BRITISH HEALTHCARE TRADES ASSOCIATION**  
Tower Bridge Business Centre  
46-48 East Smithfield • London • E1W 1AW  
Telephone: 020 7702 2141 • Email: [bhta@bhta.com](mailto:bhta@bhta.com)

The BHTA is a trade association with members in healthcare and assistive technology, all of whom commit to the BHTA Code of Practice, the only one in this industry to be approved by The Chartered Trading Standards Institute. BHTA member companies operate to higher standards of customer protection than the law requires.

