

1 **The UK National Screening Committee, the Newborn Genomes Programme, and the**  
2 **Ethical Conundrum for UK Newborn Screening**

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14 Sara M Rankin: Conceptualization, methodology, investigation, writing and editing

15 Lucy Marskell: Investigation, data analysis, and writing

16 Lina Hamad: Writing and editing

17 Laura Machin: Supervision, writing and editing

18

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23 **Disclosure of interest**

24 Sara M Rankin, Lucy Marskell, Lina Hamad, Laura Machin declare that they have no conflict  
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26

27 **Compliance with Ethics Guidelines**

28 **Consent Statement**

29 This study does not involve any human participants. Consequently, no consent for  
30 participation was required or obtained.

31

32 **Abstract**

33 Countries in the Global North use biochemical tests to screen for at least 20 diseases in  
34 newborns, while in the UK, only 10 diseases are screened for. The United Kingdom National  
35 Screening Committee (UKNSC) is the entity responsible for making recommendations to the  
36 government with regards to which conditions should be included in the Newborn Screening  
37 (NBS) programme. Examination of the meeting minutes of the UKNSC between 2015 and  
38 2022 revealed that no new diseases were recommended for NBS during this period. If there  
39 was no 'effective treatment' for the disease it was rejected for NBS. In 2022, the Newborn  
40 Genomes Programme (NGP) was announced; a research study aiming to screen for over 223  
41 rare genetic diseases using whole genome sequencing technology in newborns. While this  
42 could lead to a seismic expansion of NBS in the UK, many of the diseases included in the  
43 programme are currently considered 'actionable' rather than 'treatable' conditions. This poses  
44 an ethical conundrum for the UKNSC, which is involved in both NBS and NGP, given that it  
45 has thus far made recommendations against the expansion of the NBS programme using  
46 available biochemical assays, contrary to what has been implemented in other countries in the  
47 Global North. In this paper, we aim to critically examine the processes and circumstances that  
48 have held back the expansion of the NBS programme in the UK, as compared with other  
49 countries, focusing on the period 2015 – 2022, when no new diseases were added to the UK

50 NBS programme, and contrast them with the drivers that have led to the support and funding  
51 for the NGP during this same time.

52

### 53 **Keywords**

54 Newborn screening, genomic sequencing, newborn screening policy

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### 59 **Introduction**

60 There are over 7000 diseases, that are classified as rare genetic diseases. These are diseases  
61 that affect 1 or less people in every 2000 of the population. However, because there are  
62 thousands of different rare diseases, it is estimated that 1 in 17 people in the UK have a rare  
63 disease, this is equivalent to over 3.5 million people (UK Health Security Agency, 2018;  
64 Genetic Alliance UK, 2019). 75% of people affected by a rare genetic disease are children, with  
65 more than 30% of these children dying before their fifth birthday (Genetic Alliance UK, 2019).  
66 Living with a rare genetic disease very often requires complex care and can be life limiting for  
67 the individual but also have a significant impact on carers in terms of financial stability and  
68 mental health (United Kingdom National Screening Committee, 2019; European Organisation  
69 for Rare Diseases, 2017; Delaye et al., 2022).

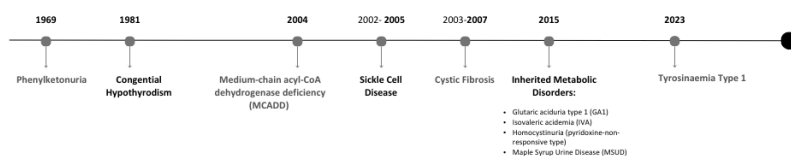
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71 In 1969 Newborn Screening (NBS) for phenylketonuria was introduced in the UK, in what was  
72 considered one of the earliest and most ground-breaking public health initiatives established to  
73 identify and manage rare diseases in infants shortly after birth (Downing and Pollitt, 2008). In  
74 the UK, NBS primarily involves biochemical analysis of blood spots collected via heel-prick  
75 on day five after birth and has been extended to 10 diseases since 1969 (Figure 1). The

76 introduction of tandem mass spectrometry (MS/MS) in the 1990s provided the opportunity to  
 77 screen blood spots for approximately 60 metabolites related to 50 different diseases in a cost-  
 78 effective way (Carlie Driscoll C and McPherson B, 2010). Since the introduction of this  
 79 technology, many countries have expanded their NBS programmes. For example, the United  
 80 States now includes 35 core conditions, Italy screens for 40 conditions, Australia includes 25  
 81 conditions, and both Japan and New Zealand screen for 20 conditions. In contrast, the UK  
 82 currently screens for 10 conditions (Therrell et al., 2024).

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84  
85

86 **Fig. 1 Conditions currently included in the United Kingdom newborn screening**  
 87 **programme**



88  
 89 While the UK was an early adopter of NBS, it has not expanded its NBS programme at the  
 90 same rate as other countries in the Global North. Consequently, the UK has been criticised by  
 91 many experts including paediatricians, obstetricians and clinical geneticists, as lagging  
 92 behind.

93  
 94 The United Kingdom National Screening Committee (UKNSC) is the entity responsible for  
 95 making recommendations to Government ministers and NHS Chief Medical Officers (CMOs)

96 with regards to which conditions should be included in the NBS programme. They are the  
97 gatekeepers when it comes to expanding the NBS programme. Genetic Alliance UK (GAUK)  
98 - a group of scientists, clinicians, and charities for rare genetic diseases – criticised the approach  
99 taken by the UKNSC in relation to the NBS programme in a report published in 2019 (Genetic  
100 Alliance UK, 2019). Criticism stems from considerable frustration that NBS for many rare  
101 metabolic diseases has been held back, when cost-effective screening tests exist. GAUK has  
102 argued that this has prevented many patients with rare genetic diseases from obtaining an early  
103 diagnosis over several decades.

104

105

106 Recent developments in “low-cost” genomic sequencing technologies provide an alternative  
107 methodology to identify rare genetic diseases. While they are considered ‘low-cost’ in relation  
108 to the cost of sequencing technology a decade ago, they are still prohibitively expensive for  
109 UK-wide NBS. However, a more targeted application of these sequencing technologies has  
110 been assessed in critically unwell babies and children; with many studies demonstrating its  
111 effectiveness in establishing diagnoses and influencing clinical management in this population  
112 (Group et al., 2021; Mestek-Boukhibar et al., 2018; Chung et al., 2020; Dimmock et al., 2020;  
113 Horton and Lucassen, 2023). Consequently, under the new Wales Infants and children’s  
114 Genome Service (WINGS), NHS Wales became the first country in the UK to introduce whole  
115 genome sequencing to rapidly diagnose rare diseases in critically ill babies and children (All  
116 Wales Medical Genomics Service, 2019). In the first two years of the WINGS service,  
117 pathogenic or likely pathogenic variants were identified in 17 children from 45 families tested  
118 (Murch O, 2021). The service has demonstrated significant health benefits for these patients,  
119 including changes to clinical management. (Jezkova et al., 2022; Murch O, 2021). A similar  
120 programme in California showed the huge cost benefit of early diagnosis of critically ill

121 children with rare genetic diseases, leading to the introduction of the “Ending the Diagnostic  
122 Odyssey Act 2021”. As a result, all 50 States’ Medicaid programmes now cover the cost of  
123 whole genome sequencing for critically ill children (Jezkova et al., 2022).

124

125 In 2022, the UK government announced the launch of the Newborn Genomes Programme  
126 (NGP), a project costing £105 million, which aims to sequence the genomes of 100,000  
127 newborns, as part of an NHS-embedded study, for genetic conditions that may impact their  
128 health in the early years of life (Genomics England, 2023c). The NGP is led by Genomics  
129 England, which was originally set up in 2013 by the United Kingdom Department of Health  
130 and Social Care to deliver the 100,000 Genomes Project (Genomics England, 2025). While the  
131 UKNSC is not a direct partner in delivering the NGP, it has been involved in its development.  
132 In 2021, the UKNSC and Genomics England jointly commissioned a public dialogue to explore  
133 the programme’s implications for newborns (Genomics England, 2021; Pichini et al., 2022).  
134 Experts from UKNSC are also members of Genomics England’s Clinical Assurance Group,  
135 which aims is to provide assurances that appropriate care and treatment for each condition in  
136 the study is accessible across the NHS (Genomics England, 2023b).

137

138 Communications on Genomics England’s website state that the results of this study “*will add*  
139 *to evidence that will inform future decisions on using whole genome sequencing to support*  
140 *newborn screening*” (Genomics England 2023c). In October 2023, Genomics England  
141 published a list of 223 individual genetic conditions that will be included in the NGP (Genomics  
142 England, 2023a). Many of the listed diseases have been previously rejected by the UKNSC  
143 from inclusion in NBS programme. This creates a contradictory position for the UKNSC; if the  
144 primary goal of the NGP is to expand NBS, the UK could achieve this by extending the  
145 biochemical analysis of blood spots similar to other countries in the Global North. The NGP

146 also raises many questions on the scope of the programme, informed consent and interpretation  
147 of uncertain findings (The Lancet, 2023; Page, 2023; Horton and Lucassen, 2023). In this paper,  
148 we aim to critically examine the processes and circumstances that have held back the expansion  
149 of the NBS programme in the UK, as compared with other countries, as well as briefly consider  
150 the ethical aspects of the NGP. Specifically, we will focus on the period 2015 – 2022 when no  
151 new diseases were added to the UK NBS programme and contrast them with the drivers that  
152 have led to the support and funding for the NGP during this same time.

153

#### 154 **Methods**

155 A review of the literature was conducted focusing on NBS policy in the UK. This included a  
156 review of the relevant grey literature such as blogs published on the UKNSC official website,  
157 evidence maps conducted by commissioned external consultants published on the UKNSC  
158 website, and reports published by relevant organisations and rare disease patient advocacy  
159 groups such as Genetic Alliance UK and the European Organisation for Rare Diseases  
160 (EURORDIS). A critical analysis of the meeting minutes published on the UKNSC website  
161 was conducted for the period 2015 – 2022. Meeting minutes were reviewed and analysed to  
162 plot key points in the evolution of NBS policy, map the diseases submitted for screening  
163 recommendations, identify the most common reasons for disease rejection as per UKNSC  
164 criteria and construct a case study to demonstrate the current recommendation process for NBS  
165 in the UK and its outcomes in comparison to other European countries and the US. To note, the  
166 UKNSC meeting minutes are only available publicly from 2015. Meeting minutes prior to this  
167 date have not been published.

168

#### 169 **Results**

170 ***The United Kingdom National Screening Committee and the evolution of the UK screening***  
171 ***criteria***

172 Established in 1996, the UKNSC serves to advise the NHS and ministers in all four countries  
173 of the UK with regards to all aspects of population screening and has responsibility for  
174 making recommendations with respect to which conditions are included in the screening  
175 programme. The UKNSC is accountable to the four CMOs, and currently recommends  
176 screening for 10 conditions via dried blood spots collected by a nurse, midwife or health  
177 visitor, five days following birth and sent to one of thirteen laboratories in the UK for testing  
178 (United Kingdom Government, 2022b). **In contrast to the UK, many other countries collect**  
179 **newborn screening samples within the first 24–48 hours of life to ensure timely detection of**  
180 **potentially serious conditions such that could manifest within the first week of life. While the**  
181 **UK approach may help reduce false-positive results for certain conditions, it also raises**  
182 **concerns regarding potential delays in diagnosing time-critical disorders such as MSUD and**  
183 **CAH, which require urgent intervention, as results can take six weeks to become available**  
184 **(Therrell et al., 2024). While these are legitimate concerns, they fall outside the scope of this**  
185 **paper.**

186  
187 **The conditions included in the UK NBS programme have been determined based on a set of**  
188 **criteria, derived from the principles originally developed by Wilson and Jungner in 1966 for**  
189 **general population screening (United Kingdom National Screening Committee, 2022;**  
190 **Jungner G and Wilson JMG, 1966). The criteria have evolved since the establishment of the**  
191 **UKNSC in 1996, with a revised list of 20 criteria published two years later by the UKNSC in**  
192 **their first report (Table 1) (United Kingdom National Screening Committee, 1998). Whilst**  
193 **the same set of screening criteria is currently in use, the process shifted in 2015, with annual**  
194 **calls put out for proposals to screen specific diseases (United Kingdom National Screening**

**Commented [LH1]:** In response to reviewer 1 comment on testing at day 5 versus first 24 hours. Thought inclusion in discussion as reviewer suggested may be distracting as the focus of the paper is not on criticising the current NBS programme and the process of how it is conducted but rather the UKNSC approach with re to its recommendations for NBS vs. NGP. The other option is to include in discussion (see discussion section below). But again, may be distracting from main focus. Thoughts?



195 Committee, 2023a). Valid proposals are taken forward by commissioning an evidence map  
196 from an external consultant (eg Costello Medical), whereby published research related to a  
197 particular proposed disease is reviewed against the 20 criteria set by the UKNSC to  
198 recommend screening. There is also public consultation, and anyone can submit a response to  
199 the call, including learned scientific or medical societies and individuals such as medical  
200 experts, scientists, patients, carers, and parents.

201

202 **Table 1. Comparison of National Screening Committee Criteria for Population**  
203 **Screening Programme with Original Wilson and Jungner Principles of Disease**  
204 **Screening**

205

206 Our analysis of meeting minutes and evidence maps of the 20 diseases put forward to the  
207 UKNSC reveals that none were recommended for NBS between 2015 and 2022.  
208 Tyrisonaemia Type 1 was recommended in early 2023 and only Severe Combined  
209 Immunodeficiency Disorder (SCID) has progressed to a pilot screen (Mackie A., 2023). Table  
210 3 provides the list of criteria (from those cited in Table 2) not met for each of these 20  
211 diseases. The three most common reasons for the UKNSC not recommending NBS for a  
212 specific disease are lack of a specific test (cited in seven cases), lack of high-quality  
213 randomised-controlled trials showing that the screening programme is effective in reducing  
214 mortality or morbidity (cited in five cases), and lack of UK-specific prevalence data (cited in  
215 five cases).

216

217 **Table 1. Diseases reviewed for newborn screening in the UK since 2015**

218 *Comparison of newborn screening criteria in the United States, the United Kingdom, and*  
219 *other European Countries*

220 In 2003, the Advisory Committee on Heritable Disorders in Newborns and Children  
221 (ACHDNC) was formed to advise the Secretary of Health and Human Services (SHHS)  
222 about newborn and childhood screening. In 2004, the ACHDNC reviewed the panel of  
223 conditions recommended for national implementation. The American College of Medical  
224 Genetics (ACMG, now the American College of Medical Genetics and Genomics) was  
225 tasked with collecting expert opinions and analysing scientific literature on newborn  
226 screening (Health Resources and Services Administration - Advisory Committee on Heritable  
227 Disorders in Newborns and Children, 2023). These findings were intended to inform  
228 recommendations, including the establishment of a standardised panel of conditions. The  
229 panel was finalised in 2005 and subsequently recommended to the SHHS, which officially  
230 approved it in 2008 (Health Resources and Services Administration - Advisory Committee on  
231 Heritable Disorders in Newborns and Children, 2023). The initial Recommended Uniform  
232 Screening Panel (RUSP) included 29 core conditions and 25 secondary conditions. Core  
233 conditions were those deemed suitable for immediate implementation, while secondary  
234 conditions were those that could be detected during screening for a core condition but  
235 required further research due to insufficient scoring. In 2010, severe combined  
236 immunodeficiency (SCID) was added, and by 2016, the panel had expanded to 35 core  
237 conditions and 26 secondary conditions (Health Resources and Services Administration -  
238 Advisory Committee on Heritable Disorders in Newborns and Children, 2023).

239 The ACHDNC follows a structured, evidence-based approach for evaluating conditions  
240 nominated for inclusion in the RUSP. After a condition gets nominated by researchers or  
241 advocacy groups, an external group compiles and analyses data for the ACHDNC, drawing  
242 from systematic literature reviews, decision-analytic modelling, and stakeholder input  
243 (Goldenberg et al., 2016). This process is structured around the chain of evidence,  
244 encompassing newborn screening, follow-up diagnostics, and treatment outcomes

245 (Goldenberg et al., 2016). The ACHDNC then evaluates the net benefit of screening based on  
 246 health outcomes, benefits, harms, and screening effectiveness, assigning a rating from A  
 247 (high benefit) to L (low certainty of benefit) (Kemper et al., 2014). In 2013, the decision-  
 248 making process was revised to include an assessment of the capability of newborn screening  
 249 programmes to implement the test, evaluating feasibility and readiness (Kemper et al., 2014).  
 250 The Decision Matrix integrates these ratings to guide recommendations, with conditions rated  
 251 A1 or A2 being strongly recommended, while others may require further research or system  
 252 improvements (Kemper et al., 2014). The final decision is submitted to the SHHS, who  
 253 provides guidance for state-level implementation (Table 4).

254 **Table 2. Decision-Making Process for Conditions Nominated to the Recommended**  
 255 **Uniform Screening Panel (RUSP)**

<b>Step</b>	<b>Description</b>
<b>Nomination</b>	A condition is proposed for inclusion in the RUSP by researchers, advocacy groups, or other stakeholders.
<b>Evidence Review</b>	An external evidence review group gathers data on screening benefits and harms from published and unpublished sources.
<b>Evidence Report</b>	A systematic review and decision analytic model is externally conducted to estimate potential benefits and risks of screening.
<b>Assessment of Net Benefit</b>	The ACHDNC assigns a rating based on health outcomes, treatment benefits, and potential harms: (A) High certainty of significant benefit. (B) Moderate certainty of significant benefit, but further research may refine findings. (C) Small to zero net benefit. (D) Negative net benefit, meaning screening could do more harm than good. (L) Low certainty due to insufficient evidence.

<b>Assessment of Capability to Screen</b>	Evaluates whether state newborn screening programs can implement testing, assigning: (1) Ready for implementation within a year. (2) Developmentally ready, but requires 1–3 years. (3) Feasible, but unprepared, requiring more than 3 years. (4) Low feasibility, making implementation impractical.
<b>Decision Matrix Evaluation</b>	Combines the Net Benefit and Capability Ratings to guide decisions: (A1) or (A2) Strong recommendation for inclusion. (A3) or (A4) Considered for inclusion, but improvements in readiness may be needed. (B), (C), (D), or (L) Not recommended, but future research may change eligibility.
<b>Final Recommendation</b>	The ACHDNC submits its recommendation to the Secretary of Health and Human Services.

256 Unlike a nationally mandated screening programme, the RUSP serves as a federal guideline  
257 for NBS. Individual states retain the authority to determine which conditions to include in  
258 their programmes. However, several states have enacted laws that align their NBS  
259 programmes with the RUSP, ensuring that any condition added to the federal panel is  
260 promptly included at the state level (Salova, 2025).

261  
262 Of note, in seven cases noted in Table 3, where the UKNSC did not recommend screening  
263 due to lack of a specific test, these diseases are currently screened for in the US programme  
264 (Biotinidase deficiency, Congenital Adrenal Hyperplasia, Galactosaemia, Long-chain 3-  
265 hydroxyacyl dehydrogenase deficiency, Mitochondrial Trifunctional Protein,  
266 Mucopolysaccharidosis I) (Health Resources and Services Administration - Advisory  
267 Committee on Heritable Disorders in Newborns and Children, 2023). Indeed, eleven of the  
268 diseases not recommended by the UKNSC for newborns in UK are part of the NBS  
269 programme in the US, which highlights the dramatic difference in the approval process  
270 between the US and the UK. The UKNSC utilises this difference to claim that the UK process  
271 is more rigorous, whereas others argue that the UK screening criteria are not appropriate for  
272 all diseases, specifically rare genetic diseases (Genetic Alliance UK, 2019; Page, 2023;

273 Downing and Pollitt, 2008). It could be argued that the difference in the scope of the NBS  
274 programme between the US and the UK may be explained by variations in health economics  
275 and the contrast between public and private healthcare systems. However, the argument of  
276 cost versus benefit is not part of the criteria used by the UKNSC to make its initial  
277 recommendations to ministers and CMOs.

278

279 NBS programmes across European countries exhibit significant variability in both the  
280 number of conditions screened and the decision-making processes governing their inclusion.  
281 While some countries, such as the Netherlands (23 conditions) and Poland (29 conditions),  
282 have extensive screening panels, others, such as Greece (5 conditions) have more limited  
283 programmes (Therrell et al., 2024; Loeber et al., 2021). The governance over the screening  
284 policy also differs, with centralised bodies similar to the UKNSC such as Germany's Federal  
285 Joint Committee and Netherland's Centre for Population Screening of the National Institute  
286 for Public Health and the Environment overseeing inclusion based on predefined criteria,  
287 whereas countries like Italy and Spain allow regional health authorities to determine  
288 screening policies. Despite these differences, many countries in Europe still screen for  
289 considerably more conditions than the UK. For example, Sweden, Portugal and Austria  
290 screens for 24 conditions, highlighting the relative restrictiveness of the UK's approach  
291 (Therrell et al., 2024; Loeber et al., 2021).

292

293

#### 294 ***Case Study – Biotinidase Deficiency***

295 Biotinidase deficiency (BD) is an autosomal recessive metabolic disorder that affects the  
296 BTD gene; this gene is responsible for producing an enzyme called biotinidase (Online  
297 Mendelian Inheritance in Man (OMIM), 2023). The disorder occurs due to an absence of

298 biotinidase activity, which results in the body's inability to breakdown and recycle biotin, a B  
299 vitamin (Online Mendelian Inheritance in Man (OMIM), 2023). In the absence of normal  
300 biotinidase activity, babies tend to develop primary neurologic symptoms such as seizures,  
301 hypotonia, vision problems and hearing loss, along with cutaneous abnormalities, including  
302 skin rashes, alopecia and recurrent viral or fungal infections (Chedrawi et al., 2008; Yang et  
303 al., 2020). Treatment consists of lifelong oral supplementation with unbound (free) biotin  
304 (Dahiphale et al., 2008). Children diagnosed before symptom manifestation generally remain  
305 asymptomatic and appear to have a normal development if adequate adherence to biotin  
306 supplementation is maintained (Dahiphale et al., 2008; Szymanska et al., 2015). If babies are  
307 not diagnosed and treatment is delayed, children suffer different degrees of irreversible  
308 neurologic symptoms such as hearing loss, visual abnormalities, and developmental delays  
309 (Liu et al., 2023).

310

311 The 2021 evidence map concludes that whole population screening for BD in newborns  
312 should not be introduced in the UK and that the current recommendation should be retained  
313 (Costello Medical., 2021). The justification for this decision was based on two observations;  
314 firstly, while some evidence on the prevalence and incidence of BD in high-income countries  
315 exists, currently there is no evidence on the prevalence and incidence rates of BD in the UK  
316 (Costello Medical., 2021). Secondly, while evidence is available on the accuracy of current  
317 screening tests using the dried blood spots for BD in high-income countries, no UK-specific  
318 evidence was found (Costello Medical., 2021). It was then established that the limited  
319 number of studies currently available, the heterogeneity in the index tests examined, and the  
320 lack of consistency in the outcomes reported limited the comparability of the evidence  
321 available (Costello Medical., 2021).

322

323 On the basis of this evidence map, the UKNSC concluded that the volume and type of  
324 evidence related to screening for BD is currently insufficient to justify an update review at  
325 this stage and should be reconsidered in three-years time. Thus, while the UK still does not  
326 screen for BD, it is screened for **in over 30 other countries**, including the US  
327 (Wolf et al., 1985; Costello Medical., 2021; **Therrell et al., 2024**). Importantly the decision,  
328 not to recommend screening for BD, moved forward despite consultation responses from the  
329 Royal College of Paediatrics and Child Health and University College London Great Ormond  
330 Street Institute of Child Health urging for early screening for BD and citing evidence on  
331 improved outcomes when early treatment is initiated (Wolf, 1993; Costello Medical., 2021).  
332 **Barry Wolf, the pioneer of BD newborn screening, published in 2017 on the successful long-**  
333 **term outcomes of adolescents and adults with profound BD who were identified through**  
334 **newborn screening, showing normal cognitive development, academic achievement, and**  
335 **healthy pregnancies in treated individuals (Wolf, 2017)**. Interestingly, BD is in the recently  
336 published list of diseases to be included in the upcoming NGP, despite being rejected for  
337 NBS by the UKNSC in 2012, 2018 and 2022.

338

### 339 ***Rare diseases and the voice of patients and parents***

340 Rare diseases, though individually affecting only a limited number of patients, collectively  
341 impact a substantial portion of the global population. It is estimated that between three to six  
342 percent of the global population suffer from a rare disease (Nguengang Wakap et al., 2020).  
343 Living with a rare disease presents a lifelong challenge, encompassing complex care needs  
344 that can significantly impact people's quality of life (Ferreira, 2019). Early diagnosis plays a  
345 pivotal role in providing individuals with rare diseases an opportunity to be involved in  
346 clinical trials and other research studies (United Kingdom Government Department of Health,  
347 2013; United Kingdom Government Department of Health, 2023). Additionally, early

348 diagnosis alleviates the emotional distress of families grappling with uncertainty, reduces the  
349 financial burden on the NHS by shortening an often-prolonged diagnostic odyssey, and  
350 facilitates the engagement of caregivers with patient support groups, offering invaluable  
351 enhancements to the quality of life for both the patients and their caregivers (Genetic Alliance  
352 UK, 2019; European Organisation for Rare Diseases, 2021). It is therefore vital that the voice  
353 of rare disease patients and that of their carers and family members is taken into  
354 consideration when developing wider national policy.

355

356 The report published in 2018 by GAUK was critical of the UKNSC with regards to how they  
357 had modified the original Wilson and Jungner criteria in a way that would make it highly  
358 unlikely to gain approval for NBS of a rare genetic disease (Genetic Alliance UK, 2019).

359 They noted that this had been done by re-wording of the original Wilson and Jungner criteria,  
360 for example “suitable test” had been changed to “validated test”, and “acceptable” treatment  
361 had been changed to “effective treatment” (Genetic Alliance UK, 2019). Moreover, the  
362 inclusion of new criteria, such as the requirement for a high quality randomised controlled  
363 trial, created an additional barrier to the addition of rare genetic diseases to the UK NBS  
364 programme (Genetic Alliance UK, 2019). In the UKNSC minutes published in 2020, it is  
365 noted that the committee reviewed the 2018 GAUK report and sent a response to the authors,  
366 but did not make any changes to the criteria with regards to NBS screening for rare genetic  
367 diseases (United Kingdom National Screening Committee, 2020). Similarly, no changes were  
368 made following the publication of EURORDIS recommendations in 2021 which promote  
369 screening that is proportionate to the reality of evidence challenges with rare diseases, and  
370 should not be unreasonable or impossible (European Organisation for Rare Diseases, 2021).  
371 Nevertheless, in a blog on the website that celebrated 25 years of the UKNSC, the committee



372 contended that the UK has “the most robust screening process in the world” (United  
373 Kingdom National Screening Committee, 2021).

374

375 ***Reform of the United Kingdom National Screening Committee***

376 With the reorganisation of the UKNSC, a Blood Spot Task Group (BSTG) was established in  
377 2022 consisting of paediatricians, academics, ethicists, quality assurance professionals,  
378 geneticists, as well as patient and public voice representatives (United Kingdom Government,  
379 2022). The task group’s first aims are to compare the UK screening and implementation  
380 practices with the EURODIS key principles in NBS, develop recommendations that meet the  
381 challenges of finding good quality evidence on the accuracy of different tests for rare genetic  
382 diseases, and develop a publication on the challenges and solutions in economic models  
383 relating to NBS (Seedat F., 2022).

384

385 Review of the BSTG meeting minutes in July 2023 reveals that a manuscript comparing the  
386 EURORDIS principles with UK practices was submitted for peer review, taking into  
387 consideration feedback received from patient and public voice members (United Kingdom  
388 National Screening Committee, 2023b). In the paper, which was published two months later  
389 (Lombardo et al., 2023), the UKNSC concluded that UK practices are only partially aligned  
390 with the EURORDIS first principle, which recommends identifying opportunities to support  
391 the newborn and their family as broadly as possible, including making recommendations for  
392 screening of actionable conditions - defined by EURORDIS as conditions where early  
393 intervention leads to health benefits for the newborn, conditions where facilitation of early  
394 diagnosis avoids a prolonged diagnostic *odyssey*, or where there are improved outcomes for  
395 the family such as access to patient groups and informed reproductive rights (European  
396 Organisation for Rare Diseases, 2021). The UKNSC maintains that NBS should only be

397 recommended when a disease is treatable (Lombardo et al., 2023), which is in contrast to the  
398 approach of EUDORIS. It is surprising, therefore, that Genomics England has taken the  
399 decision to identify 223 rare genetic diseases in babies, most of which are not treatable, but  
400 are considered actionable diseases (Genomics England, 2023c).

401

402 During 2020 and 2021, the UKNSC worked with a representative of the Nuffield Council on  
403 Bioethics to review the way the committee considers the ethical aspects of the current  
404 screening programme, and new members with expertise in ethics and social science were  
405 recruited (Joynson, 2021). This resulted in the suggestion of four new core ethical principles  
406 that should be considered in the decision-making process of the UKNSC when examining  
407 new cases for NBS (Table 5) (Joynson, 2021). However, it is not clear from the UKNSC  
408 minutes whether consideration of these four new ethical principles has had any influence on  
409 the committee's current decision-making process.

410 **Table 5. The UK National Screening Committee four principles of ethical evaluation**

411

412 In summary, the minutes of the UKNSC between 2015 and 2022 show that the UKNSC has  
413 rigidly adhered to an algorithmic decision-making process, which requires each of the 20  
414 screening criteria (Table 2) to be met before recommending a new disease for NBS. As a  
415 result, between 2015 and 2022 no new disease has been added to the UK NBS programme,  
416 despite the voice of parents, and medical and scientific experts. By contrast, other countries  
417 have expanded their screening programmes considerably during this time by using low-cost  
418 biochemical assays and adopting a more pragmatic approach to their screening criteria.

419

420 *Genomics England and the introduction of the Newborn Genomes Programme*

421 In 2016, CMO Dame Sally Davies entitled her annual report ‘Generation Genome’, setting  
422 the stage for establishing Genomics England and the 500,000 Genome Project, Genomic  
423 England’s first initiative to sequence adult patients affected by rare diseases or cancer (Davies  
424 C. S., 2016). The main argument put forward for this work is the potential of personalised  
425 medicine and prevention over cure, which is predicted to increase population health and  
426 reduce healthcare costs. The project was funded by the Wellcome Trust (an independent  
427 medical charity), UK Research and Innovation (UKRI) with four Biopharmaceutical  
428 companies (Amgen, Astra Zeneca, GSK, and Johnson & Johnson), each contributing  
429 £120,000 million to the project (Bell, 2019). Of note, the genomic data of individuals  
430 participating in the project was linked to their healthcare data, which was provided by the  
431 NHS. The full anonymised data (genomic and healthcare) from the 500,000 genomes project  
432 was released by the UK Biobank in 2023 with the four BioPharmaceutical companies given  
433 early access to the data, nine months before it was made public (Bell, 2019). The value of this  
434 resource to the scientific community and businesses (eg Biopharma, healthcare and health  
435 insurance) is immeasurable and data from the BioBank has already contributed to over 9000  
436 scientific research papers (Callaway, 2023).

437

438 In 2020, Genomics England announced a public dialogue, jointly commissioned by the  
439 UKNSC, to assess whether the public would support whole genome sequencing of 100,000  
440 newborns (Hopkins Van Mil., 2021; Pichini et al., 2022). A total of 133 participants took part  
441 in the public dialogue and the responses were reported to be ‘largely positive’ (Hopkins Van  
442 Mil., 2021). This report has been used to evidence the public’s approval of genomic screening  
443 of newborns. However, participants’ demographics data such age, gender, religion, ethnicity,  
444 and educational level was not made available in the report. This information is important for  
445 assessing the validity of the study, and its absence limits the ability to evaluate the

446 generalisability of the findings. Moreover, the small sample size did not allow for  
447 stratification of opinions according to different characteristics e.g. pregnant women, parents  
448 etc. Nevertheless, based on the “largely positive” response from the public consultation, an  
449 independent ethics committee was established to determine the criteria for inclusion of  
450 genetic diseases in the NGP (Genomics England, 2023d). In 2022, a public survey with  
451 respect to these criteria was undertaken and four ethical principles were identified to guide  
452 the choice of conditions to be screened for as part of the NGP (Table 6) (Genomics England,  
453 2023b).

454

455 **Table 6. Ethical principles guiding the selection of conditions included in the Newborn**  
456 **Genomes Programme**

457 These principles diverge significantly from the criteria set by the UKNSC with respect to  
458 NBS. Firstly, the language used to describe these principles is open to interpretation, in  
459 particular when determining what is considered “strong evidence” or a “high proportion” of  
460 individuals. Secondly, the third principle set by Genomics England does not specify  
461 requirement for UK specific data or evidence from double-blind randomised clinical trials,  
462 which are conditions that need to be met for UKNSC to recommend screening. Moreover,  
463 whilst Genomics England published the list of conditions that will be included in the NGP,  
464 the evidence maps showing how these conditions meet the ethical criteria have not been made  
465 publicly available (Genomics England, 2023a). It is clear that the ethical principles guiding  
466 the choice of conditions the NGP aims to identify through whole genome sequencing differ  
467 significantly from those of the UKNSC. While we would expect to see a change in ethical  
468 principles with time, it would not be ethically and morally acceptable to have the UKNSC  
469 NBS programme and the NGP operating at the same time, given that NGP is being promoted  
470 on the Genomics England website as ‘an extension of the NBS programme’, giving the

471 impression that diseases screened for in the NGP could become part of the NBS in the future  
472 (Genomics England, 2023c).

473

474 It could be argued that Genomics England does not have to strictly adhere to the UKNSC  
475 criteria. However, the NGP is a study involving 100,000 newborns and their families, and is  
476 imbedded in, and jointly run by, the NHS. Horton and Lucassen provide a critical  
477 examination of the complexities and challenges of newborn genome screening based on  
478 insights from the NC NEXUS and BabySeq projects – two studies conducted in the US that  
479 aimed to explore the use of genomic sequencing in newborns in identifying actionable  
480 conditions and assess its impact on health outcomes. The authors highlight that the findings  
481 from these projects often identified specific risks that were difficult to quantify and required  
482 resource-intensive monitoring, rather than offering straightforward diagnoses with actionable  
483 treatments (Horton and Lucassen, 2023). The added costs of repeated investigations and  
484 regular reviews over the lifetime of these patients – who may never develop these conditions  
485 – will significantly impact the NHS and should be appropriately addressed prior to embarking  
486 on a study of this scale.

487

488 Another important aspect of the NGP is the nature of informed consent. Parents will have to  
489 sign a consent form on behalf of their baby. It is therefore vital to determine how information  
490 on the 223 genetic diseases will be presented to parents and at what point in time will it be  
491 presented to ensure consent is informed. Information of this significance should be delivered  
492 by trained professionals in the appropriate settings and at an appropriate time, with both  
493 parents being present for informed consent (Science Media Center, 2022). Indeed, both  
494 UKNSC and EURORDIS agree that whenever new programmes are piloted in the UK, all  
495 stakeholders should be involved in the planning of and implementation of the project,

496 including designing and field-testing information and educational materials about the  
497 conditions included in screening programmes, the tests, and the subsequent treatment  
498 pathways, with the relevant stakeholders, modifying this information based on their feedback  
499 (Genomics England, 2021; European Organisation for Rare Diseases, 2021). This is  
500 considered essential for efficient implementation of the programme and to enable parents to  
501 make informed decisions about NBS, or in this case, the NGP.

502  
503

#### 504 **Discussion**

505 Despite the fact that the UKNSC has promoted itself as having the most robust NBS  
506 programme globally, we question whether this has been in the interests of the patients, carers,  
507 and their physicians. The rigid adherence to the 1998 screening criteria created by the UKNSC  
508 has held back the diagnosis of rare diseases in many newborns, by restricting NBS to only nine  
509 diseases up to 2022. In certain cases, this may have resulted in irreversible disease progression  
510 e.g. hearing loss due to BD, in others, the stress and expense associated with the diagnostic  
511 odyssey and lack of timely access to support groups may have severely impacted the quality-  
512 of-life of many patients and their families. A summary of key points in the evolution of NBS  
513 policy in the UK is provided in Figure 2. **To note, in contrast to the UK, many countries collect**  
514 **newborn screening samples within the first 24–48 hours of life to ensure timely detection of**  
515 **potentially serious conditions such that could manifest within the first week of life. While the**  
516 **UK approach may help reduce false-positive results for certain conditions, it also raises**  
517 **concerns regarding potential delays in diagnosing time-critical disorders such as MSUD and**  
518 **CAH that require urgent intervention, as results can take six weeks to become available**  
519 **(Therrell et al., 2024). While these are legitimate concerns, they fall outside the scope of this**  
520 **paper.**

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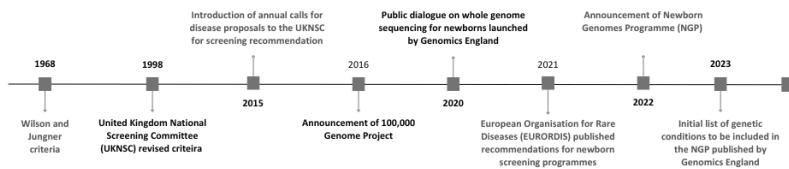
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523

524

525 **Fig. 2 Key points in the evolution of newborn screening policy in the United Kingdom**



526

527 Examination of the reasons given by the UKNSC for not recommending specific conditions  
528 highlights that it would be almost impossible to provide all the evidence required to meet the  
529 20 criteria set in 1998, especially when the government does not provide funding to carry out  
530 the necessary research to address all the criteria. Some of the listed criteria are unlikely to be  
531 met for many rare diseases, other criteria prevent screening for diseases that may not be  
532 treatable but are actionable. The UKNSC has thus far adopted an algorithmic decision-  
533 making process. As such consistency is ensured, but many morally relevant factors are  
534 excluded. Indeed, an algorithmic decision-making process does not take into account many  
535 important moral arguments (Friesen et al., 2019). Instead, a discretionary decision-making  
536 process takes into account complex and multi-faceted factors and includes patient and carer  
537 voices and allows for certain inconsistencies in the process under certain circumstances. This  
538 is akin to the justice system, whereby sentencing takes into account many different factors.  
539 Having an inflexible decision-making process has led to the point where decisions are being  
540 reached that seem unreasonable to experts and patients. Indeed, adopting this process resulted

541 in no new diseases being approved for NBS in UK between 2015 and 2022, putting the UK  
542 NBS dramatically behind other countries in the Global North.

543

544 Similar to the UK, several countries have initiated pilot studies integrating genome  
545 sequencing into NBS programmes. The United States (BabySeq, GUARDIAN), Australia  
546 (BabyScreen+), and Belgium (Baby Detect) have all introduced genomic screening pilots  
547 with varying degrees of flexibility in condition selection, expanding beyond conditions  
548 historically included in biochemical panels. Comparative analyses show substantial variation  
549 in gene and disease selection across countries, highlighting a lack of consensus on which  
550 conditions should be included in genomic sequencing pilot studies (Betzler et al., 2024).  
551 Nevertheless, there is a growing international trend toward less stringent inclusion criteria for  
552 genome sequencing programmes in comparison to biochemical assays, though this  
553 divergence is more pronounced in the UK. The lack of progress in NBS creates an anomalous  
554 position when Genomics England is just about to commence screening for over 200 rare  
555 genetic diseases in 100,000 newborns enlisted into their research study. Only four ethical  
556 principles need to be met for inclusion in the NGP, as compared to 20 screening criteria for  
557 the NBS. This raises the possibility that conditions listed in Table 3, and previously rejected  
558 by UKNSC, could be reviewed using the new NGP ethical criteria and not be rejected. This,  
559 in turn, prompts the question of whether the UKNSC should automatically reassess these  
560 diseases for inclusion in the broader NBS programme. Indeed, BD which was rejected for  
561 NBS by UKNSC three times over 10 years, is one of the diseases that will be screened for in  
562 the NGP, making it challenging for the UKNSC to justify this position, given their  
563 involvement in both the NBS and NGP.

564 Communications to the public from the Government and Genomics England have  
565 consistently implied that NGP is a pilot study that could ultimately extend the NBS



566 programme and that the 200 plus diseases that will be tested for are essentially treatable  
567 (Parry, 2023; Queen Mary University of London, 2022). This raises a number of ethical  
568 concerns. Firstly, the diseases are being differentially described as either treatable or  
569 actionable dependent on the communication. This is likely to lead to confusion with the  
570 general public, who may not appreciate the critical difference in these terms. The inclusion of  
571 actionable diseases is at odds with the principles of the UKNSC, as laid out above. However,  
572 from the list of 223 genetic diseases published, it is clear that some will be actionable and not  
573 treatable and that some of the treatments involve gene editing and bone marrow transplants  
574 which may not be available within the time frame of the programme (Bick et al., 2021). In  
575 most countries as well as the UK, routine NBS is an opt-out process—parents do not need to  
576 actively consent, as it is considered a public health initiative focused on serious, treatable  
577 conditions (Horton and Lucassen, 2023). Genomic sequencing pilots, however, require  
578 explicit informed consent. This need for informed consent should shape the disease selection  
579 process as researchers must justify which conditions are included in a way that parents will  
580 find acceptable. The terms "actionable" and "treatable" conditions should be defined, but  
581 parental perceptions of 'actionability' may still differ. Evidence maps for each disease should  
582 therefore be publicly available to justify inclusion, particularly for actionable diseases.  
583 Parents should also be informed during the consent process of the different treatment options  
584 for each disease to be tested. Secondly the communications suggest that the primary goal of  
585 the NGP is to expand the NBS programme (Genomics England, 2023c). If this was the  
586 primary driver, as noted by others, the UK could simply extend the existing biochemical  
587 analysis of blood spots to nationally screen, at a low cost, for up to 35 rare genetic diseases,  
588 as other countries in the Global North are currently doing (Commonwealth of Australia -  
589 Department of Health and Aged Care, 2023; National Screening Unit, 2014).

590

591 It is important to appreciate the current relative costs of whole genome sequencing (£1050 /  
592 baby) versus biochemical analysis of blood spots (59p / baby) (Bessey et al., 2020). The cost  
593 of the NGP, funded by the Government is £105 million (United Kingdom Government,  
594 2022a). Given approximately 700,000 babies are born in the UK annually, the cost of  
595 increasing biochemical analysis would be £413,000 a year, versus £735 million a year for  
596 genomic screening (Bessey et al., 2020). If genomic screening became a standard screening  
597 method it would require a serious commitment of funding from the NHS, a system that is  
598 currently under extreme financial strain.

599

600 It is evident that the genetic diseases included in the NGP will not need to fulfil the 20  
601 screening criteria as set out in 1998 by the UKNSC. Yet, it remains unclear how the UKNSC  
602 justifies this radical shift in their decision-making process or how Genomics England's  
603 comparatively light-touch approach will influence the outcome. It is possible such shifts will  
604 lead to a loss in public confidence and trust in the UKNSC and its processes. Publication of  
605 the evidence maps, such that scientists and parents can see the decision-making process and  
606 be made aware of the treatment options for each of the 223 genetic diseases, would increase  
607 public confidence. Furthermore, justification as to why £105 million is to be spent on NGP is  
608 required, particularly when it would cost much less to extend the current NBS programme by  
609 MS/MS, or to extend the successful targeted genetic screening programme of critically ill  
610 babies and children as established in Wales, to other nations in the UK. Alternatively, if the  
611 primary driver for the NGP is to create a World-leading data resource that will drive research  
612 into genetic diseases and improve healthcare outcomes for the population this should be  
613 clarified in all communications for the general public. Open and transparent communication  
614 that the NGP is a research project and not 'an extension of NBS', as is implied on the

615 website, would increase public understanding of the project, allow for more informed public  
616 engagement, and appropriately manage expectations.

617

#### 618 **Declarations**

#### 619 **Funding Statement**

620 This work received no specific grant from any funding agency in the public, commercial, or  
621 not-for-profit sectors.

#### 622 **Disclosure of interest**

623 The authors declare that they have no conflict of interest.

624

#### 625 **Compliance with Ethics Guidelines**

#### 626 **Consent Statement**

627 This study does not involve any human participants. Consequently, no consent for  
628 participation was required or obtained.

629

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