

<b>Reference:</b>	FOI.13527.24
<b>Subject:</b>	Ambulatory Electrocardiogram (ECG) recording
<b>Date of Request:</b>	8 January 2024

**Requested:**

I am requesting information on your Trust's usage of ambulatory electrocardiogram (EKG or ECG) Holter monitors and associated software for analysis reporting.

Specifically, could you please provide answers to the following questions:

1. Does the Trust use ambulatory electrocardiogram (EKG or ECG) Holter monitors? (Yes or No)
  - a. If "Yes" then which make and models are currently in use and how many of each are currently deployed?
  - b. If "No" then does the Trust intend to implement ambulatory electrocardiogram (EKG or ECG) Holter monitoring in the near future? (Yes or No)
2. Does the Trust use software to read EDF reports? If ""Yes"" then which vendor(s) are used?
3. Does the Trust use an external ECG Interpretation Provider. If ""Yes"" then which vendor(s) are used?
4. How many ambulatory electrocardiogram ECG readings does the Trust perform each year?
5. What is the split of the ambulatory ECG reading volumes in question 4, by length of recording? (e.g. 24hr, 48h, 72h, 7-day, 14-day)
6. In what environment are the ambulatory ECG holters fitted? (e.g. secondary care, community diagnostic centre [CDC], primary care)
7. What is your preferred buying method for these devices? (e.g. Direct, Supply Chain, Other)
8. How much did the Trust pay for its currently deployed ECG Holter devices and software (per device), and what costs are associated with maintenance, such as battery replacement, servicing etc?
9. Does the Trust have service contracts for the currently deployed ambulatory ECG devices. If so, how much is this per annum for the different brand of devices by vendor(s)?
10. How many ambulatory ECG monitors did the Trust purchase in 2020, 2021, 2022 and 2023 per make and model of Holter monitor?
11. What is the Trust's wait time for ambulatory ECG Holter Fittings and ECG reporting?
12. Is the Trust meeting their targets for ambulatory ECG recording volumes and patient waiting times? (Yes or No)
13. What are the Trusts biggest challenges for cardiology ECG ambulatory recordings?

14. Is the Trust considering purchasing any new ambulatory ECG Holter monitors? For replacement of old devices, broken devices, or needing more equipment?
15. Who is the Trust's senior electrophysiologist or cardiology manager and what are their contact details? (Name, position, email, telephone)

**Response:**

Hywel Dda University Health Board (UHB) is unable to provide you with all of the information requested for questions 8 and 9, as it is estimated that the cost of answering your request would exceed the "appropriate limit" as stated in the Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004. The "appropriate limit" represents the estimated cost of one person spending 18 hours (or 2½ working days) in determining whether the UHB holds the information, and locating, retrieving and extracting the information.

The UHB does not centrally record the costs for maintenance. Therefore, in order to provide you with all of the information requested for question 8, the UHB would need to contact each service that uses ECG Holter monitors to request them to undertake a manual trawl of any devices' maintenance logs and cross reference with the Finance Ledgers, to identify any information that may fulfil this part of your request.

Additionally, for question 9, the UHB cannot separate the contract costs as the contract has mixed functionality and to identify the information relevant to the request, the contract details would need to be interrogated for each monitor type.

The UHB is therefore applying an exemption under Section 12 of the Freedom of Information Act 2000 (FoIA), which provides an exemption from a public authority's obligation to comply with a request for information where the cost of compliance is estimated to exceed the appropriate limit.

However, under Section 16 of the FoIA, we are required as a public authority, to provide advice and assistance so far as it is reasonable to individuals who have made a request under the FoIA. Therefore, the UHB provides the accessible information it holds below.

1. The UHB confirms that it does use ambulatory ECG Holter monitors.
  - a. The UHB provides, within the table below, the makes, models and number of the ECG Holter monitors currently in use.

Make and model	Number
Spacelabs CF recorders and eclipse	62
AliveCor	30

2. The UHB confirms that it does not use software to read European Data Format (EDF) reports.
3. The UHB confirms that it does not use an external provider for ECG interpretation.
4. The UHB confirms that it undertakes between twelve thousand (12,000) and thirteen thousand (13,000) ambulatory ECG readings per annum.

5. The UHB provides, within the table below, a percentage breakdown of ambulatory ECG reading volumes by length of recording.

Length of ECG	Percent
24 hours	36%
48 hours	25%
72 hours	6%
7 days	32%
ECG event monitor	0.7%

6. The UHB confirms that the ambulatory ECG Holter monitors are fitted within Primary Care, Secondary Care and Community Care.
7. The UHB's Procurement Service in NHS Wales Shared Services Partnership (NWSSP) procures its ECG monitors. We therefore recommend that you redirect this part of your request to the Freedom of Information (FoI) Team in NWSSP, who may be able to help you with your enquiry. Contact details for NWSSP are as follows:-

[shared.services@wales.nhs.uk](mailto:shared.services@wales.nhs.uk) or alternatively, you can contact: Information Governance Manager, 4-5 Charnwood Court, Heol Billingsley, Parc Nantgarw, Cardiff, CF15 7QZ.

8. A Section 12 exemption has been applied. However, under Section 16 of the FOIA, the UHB confirms that the total spend on its currently deployed ECG Holter devices and software is £94,675.00.
9. A section 12 exemption has been applied. However, under Section 16 of the FOIA, the UHB confirms that it has a service contract with Spacelabs for its currently deployed ECG Holter devices; the cost is between £130.00 and £261.00 per device. The cost per annum for the devices is approximately £26,000.00 and the costs for the analysers is approximately £17,350.00, with the servicing of these devices included.
10. The UHB provides, within the table below, the number of ambulatory ECG Holter monitors purchased, by make and model, during the 2020 to 2023 calendar years.

Calendar year	Eclipse Pro	Kardia Mobile ECG	Lifecard CF
2020	0	0	16
2021	0	22	27
2022	0	8	2
2023	14	0	3

11. The UHB confirms that the waiting time for ambulatory ECG Holter fittings and ECG reporting is currently twelve (12) weeks.
12. The UHB confirms that it is not currently meeting its targets for ambulatory ECG recording volumes and patient waiting times.
13. The UHB confirms that the challenges for Cardiology ECG ambulatory recordings are due to the increased number of referrals received and staffing levels.

14. The UHB confirms that it is in the process of purchasing ten (10) new Eclipse Pro Holter monitors. These purchases are for additional equipment due to demand.
15. The UHB is withholding the requested information. This decision has been made as it is not within the reasonable expectations of these individuals that their personal data would be put into the public domain. This information is classed as personal data of a third party. Therefore, it is being withheld in accordance with the exemption set out in section 40(2) of the FoIA, by virtue of section 40(3)(a) of the FoIA, which permits a public authority to withhold personal data other than the requestor's where the disclosure would breach Data Protection principles.

This information is protected by the Data Protection Act 2018 (DPA)/UK General Data Protection Regulations, as its disclosure would constitute unfair and unlawful processing and would be contrary to the principles and articles of the UK GDPR. This exemption is absolute and therefore, there is no requirement to apply the public interest test.

In reaching this decision, the DPA and UK GDPR define personal data as data that relates to a living individual who can be identified solely from that data or from that data and other information, which is in the possession of the data controller.

However, the UHB's Cardiology Service has a Service Delivery Manager, who can be contacted at the following hospital address:

Glangwili General Hospital  
Dolgwili Road  
Carmarthen  
SA31 2AF