

Reference:	FOI.13315.23
Subject:	Advertising and email signatures
Date of Request:	5 December 2023

Requested:

1. Please could you furnish me with any policy you or government guidelines have on advertising private companies.
2. [british-sign.co.uk](https://www.british-sign.co.uk) is the trading name of Lisia Digital Limited which you can find in their privacy policy here: <https://www.british-sign.co.uk/privacy-policy/>

This limited company (<https://www.lisiadigital.gg/>) is registered in Guernsey and you can search the registry here: <https://portal.guernseyregistry.com/> where the official is listed as Mr Simon Thomas Harvey. The company sells online materials for BSL learning,

This private business has a fingerspelling generator, <https://www.british-sign.co.uk/fingerspelling-word-generator/> which generates an image of fingerspelling of whatever you ask it to which can be saved to your computer. The company's website address is displayed in the corner, i.e. advertising. This image has been added to an email signature, which displays a person's name and it also carries advertising for a company.

Please could you tell me how many staff have added an image of this fingerspelling generator to your organisation's email signature.

Response:

1. Hywel Dda University Health Board (UHB) does not hold any policies or guidelines on advertising private companies and the UHB is not aware of any All Wales guidelines around this.
2. The UHB is unable to provide you with the information requested for question 2, as it is estimated that the cost of answering your request would exceed the "appropriate limit" as stated in the Freedom of Information Act 2000 and the 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 holds over 10,000 staff email accounts, in which staff members individually create their own email signature. The UHB does not hold a central record of these email signatures. In order to determine the number of email accounts that have added an image as you describe within your request to their email signature, the UHB would need to undertake a manual trawl of all the UHB email accounts, to identify any information that may fulfil your request, as this information is not recorded centrally.

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.