

Reference:	FOI.19375.26
Subject:	Balance/Vestibular services
Date of Request:	22 January 2026

Requested:

I am writing to request the following recorded information held by the Trust regarding balance/vestibular services.

For the purposes of this request, “audiologist” includes clinical scientists, healthcare scientists, and practitioners working in audiology at any grade (including those specialising in balance/vestibular assessment).

1. Balance / vestibular service provision
 - a. How many balance or vestibular clinics does the Trust currently operate within the audiology department alone and within the ENT department
 - b. Where balance/vestibular assessments are provided within a wider service rather than via a standalone clinic, please indicate this.
2. Employment of audiologists
 - a. How many audiologists are currently employed by the Trust that are active in offering vestibular assessment at the date of this request (headcount and FTE, if held)?
 - b. How many audiologists are currently employed by the Trust that are active in offering vestibular rehabilitation at the date of this request (headcount and FTE, if held)?
3. Workforce needs – current

Does the Trust hold assessment, workforce plan, or internal analysis relating to the number of audiologists required to meet current service demand?
If so, please provide that assessment.
4. Workforce needs – future

Does the Trust hold any assessment, workforce plan, or projection relating to future audiology workforce needs? for example, 3 years, 5 years, or 10 years).
If so, please provide that/those assessments.
5. Long-term planning

Does the Trust hold any assessment or modelling of audiology (including balance/vestibular) workforce or service needs looking ahead 10 years or more?
If so, please provide that/those assessments.

WHERE POSSIBLE PLEASE RESPOND USING THE ATTACHED SPREADSHEET TEMPLATE

Response:

Hywel Dda University Health Board (UHB) has applied a Section 38 exemption of the FoIA to some details contained within attachment 3, due to Health and Safety concerns that full disclosure of the information requested may have on third parties.

This exemption allows Public Authorities to exempt information that it believes would endanger an individual’s physical or mental health upon disclosure. Due to the sensitivity of the information

contained within the documents, the UHB believes that disclosure of the information could negatively impact the mental or physical health of staff members and the public alike.

Some information contained within attachment 3 captures personal and professional opinion, along with details on the vulnerability and the management of services. Disclosure of the information without full detail or context could cause the reader to form an opinion, and raise concern regarding the stability of services and service delivery, which could in turn result in adverse effects on an individual. The UHB considers that the disclosure of all of the information would be likely to prejudice the UHB, as disclosure could negatively impact the mental or physical health of some individuals and cause unnecessary concern and alarm within communities and our workforce.

This exemption is qualified; therefore, even if information falls within Section 38, public authorities must apply the public interest test set out in Section 2(2)(b).

The information can only be withheld if the public interest in maintaining the exemption outweighs the public interest in disclosure. The UHB has therefore considered the following:

In favour of disclosure: There is a legitimate public interest in the openness and transparency of information. The UHB has a duty to inform the public of any circumstances, including the fragility of services, that may cause delays with treatment subsequently affecting people's health, along with contributing to the public's understanding of matters that affect people's lives. Disclosure may enhance the public's understanding of the UHB's challenges and how they are managed, thus building trust between the public and the UHB.

Against Disclosure: Disclosure of all the information requested may cause harm to the health and safety of individuals. If the UHB did disclose all of the information requested without appropriate context or explanation, this could lead to misinterpretation and/or misunderstanding, which could result in panic, alarm and distress for staff, patients and members of the wider public.

If the UHB disclosed all elements of the information requested, this could undermine any internal process and would likely impede the public's confidence in the UHB's ability to manage health matters effectively.

Decision: The UHB has determined that the public interest in withholding some of the information requested is greater than the interest in disclosing it. The UHB acknowledges that while transparency is important, it believes that releasing some of the information without full and appropriate context could lead to significant misunderstanding, which in turn could potentially cause unnecessary alarm and distress among its staff and the wider public. Furthermore, this may also lead to the spread of misinformation or speculation, which could have harmful consequences both internally within the UHB and externally with patients and members of the wider public.

Therefore, the public interest in withholding some of the information within attachments 2 and 3 is greater than the disclosure.

The UHB is also withholding some of the figures in attachments 2 and 3, due to the low number of cases (less than 5), and the total figures which could be used to calculate the redacted figures, as there is a potential risk of identifying individuals if this was disclosed.

In addition, the UHB has applied redactions to some personal information as it is not within the expectation of these individuals that their personal data would be released into the public domain. This information is classed as personal data of a third party.

Therefore, the UHB is withholding these details under Section 40(2) of the Freedom of Information Act 2000 (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 (UK GDPR), 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, whilst operating in accordance with the Section 45 Freedom of Information Code of Practice, the UHB has a duty to provide advice and assistance and provides the accessible information it holds within the spreadsheet as requested, at Attachment 1.