

<b>Reference:</b>	FOI.18652.25
<b>Subject:</b>	British Sign Language (BSL) provision in Maternity Services
<b>Date of Request:</b>	21 October 2025

**Requested:**

I would like to request the following information relating to maternity services delivered by Hywel Dda University Health Board:

1. How many pregnant women had communication needs flagged under the NHS Accessible Information Standard (AIS) between 1 Jan 2020 and 31 Aug 2025?
2. Of these, how many were recorded as requiring British Sign Language (BSL) interpretation?
3. Number and percentage of instances where an in-person BSL interpreter was provided during:
  - a. Antenatal/prenatal appointments
  - b. Intrapartum period (labour and childbirth) - including but not limited to elective caesarean section and emergency caesarean section.
  - c. Neonatal period - including but not limited to intensive neonatal care.
  - d. Postnatal/postpartum appointments - up to 12 months after the birth - including but not limited to community midwife and health visitor appointments.

If this breakdown is not available, please provide the total number of occasions when this was the case across all maternity services.

4. Number and percentage of instances where video remote interpreting (VRI) was used during:
  - a. Antenatal/prenatal appointments
  - b. Intrapartum period (labour and childbirth) - including but not limited to elective caesarean section and emergency caesarean section
  - c. Neonatal period - including but not limited to intensive neonatal care.
  - d. Postnatal/postpartum appointments - up to 12 months after the birth - including but not limited to community midwife and health visitor appointments.

If this breakdown is not available, please provide the total number of occasions when this was the case across all maternity services.

5. Number and percentage of instances where no interpreter was provided despite sign language needs being recorded.
  - a. Antenatal/prenatal appointments - including but not limited to elective caesarean section and emergency caesarean section.
  - b. Intrapartum period (labour and childbirth) - including but not limited to elective caesarean section and emergency caesarean section
  - c. Neonatal period - including but not limited to intensive neonatal care.
  - d. Postnatal/postpartum appointments - up to 12 months after the birth - including but not limited to community midwife and health visitor appointments.

If this breakdown is not available, please provide the total number of occasions when this was the case across all maternity services.

6. The number of:
- elective caesarean sections involving deaf, hard of hearing, hearing-impaired, or deafened patients
  - emergency caesarean sections involving deaf, hard of hearing, hearing-impaired, or deafened patients

If this breakdown is not available, please provide the total number of caesarean sections - elective and emergency - involving deaf, hard of hearing, hearing-impaired, or deafened patients.

7. Number of Datix incidents, complaints, or serious incident reports between Jan 2020 – Aug 2025 involving deaf, hard of hearing, hearing impaired or deafened patients.

**Response:**

Hywel Dda University Health Board (UHB) is unable to provide you with all the information requested, 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 (Appropriate Limit and Fees) Regulations 2004. The “appropriate limit” represents the estimated cost of one person spending 18 hours (or 2 ½ working days) in determining whether the UHB holds the information, and locating, retrieving and extracting the information.

In order to provide you with the information requested for questions 1 to 6, the UHB would need to undertake a manual trawl of all Maternity paper-based patient records for the stipulated time period, to identify any information that may fulfil these parts of your request, as it is not collated and recorded centrally.

The UHB is also unable to provide the information for question 7, as disabilities or medical conditions are not captured and consequently are not searchable items. The UHB would need to undertake a search of all complaints recorded on its two (2) Datix incident and risk reporting systems that relate to Maternity Services, and manually trawl each record to identify if any information relating to deaf, hard of hearing, hearing impaired or deafened patients is recorded, to fulfil this part of your request, as again it is not recorded centrally.

The UHB’s Datix team has undertaken a search of its current system, which only covers the period 1 April 2021 to 31 August 2025, and can confirm that it has identified two thousand, nine hundred and fifty-five (2,955) records relating to Maternity Services. Therefore, it is estimated that a manual search of these records would exceed the 18 hours stipulated within the Freedom of Information Act 2000 (FoIA). Based on the number of records identified, conducting a search of digital records taking a minimum of five (5) minutes per digital record, would far exceed the ‘appropriate limit’, costing the UHB the following:

2,995 @ 5 minutes per item = 249 hours and 35 minutes  
249 hours and 35 minutes @ £25 per hour = £6,239.58

The UHB is therefore applying an exemption under Section 12 of the 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, which can include assisting a requestor to further refine their request.

You may further refine your request by reducing the timeframe requested. However, the UHB would still be required to undertake a manual search of maternity and Datix records, so the outcome would be dependent on the number of returned items.

Under Section 16 of the FoIA, the UHB has undertaken a search of its Welsh Patient Administration System (WPAS) and can provide the following information it holds relating to your request.

1. The UHB can confirm that during the period 1 January 2020 to 31 August 2025, three hundred and twenty-four (324) pregnant women had 'sensory loss' recorded on the WPAS.

However, the UHB is unable to provide you with the number of women that had a medical condition recorded as deaf, due to the low number of cases (less than 5), as there is a potential risk of identifying individuals if this was disclosed. Therefore, the UHB is withholding these details under Section 40(2) of the Freedom of Information Act 2000 (FoIA).

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.