

<b>Reference:</b>	FOI.20164.26
<b>Subject:</b>	Consultant Supporting Professional Activities (SPAs) and external duties
<b>Date of Request:</b>	10 April 2026

**Requested:**

If possible, we would appreciate responses in Excel or CVS format.

Please provide the following information regarding *substantive consultant medical and dental staff* for your most recently completed job planning round (and in section 5, the past 5 years).

**Workforce Overview**

1. The number of substantive consultants employed (headcount and WTE).
2. Your organisation's current standard (or reference) job plan for a full-time consultant, including the normal DCC/SPA split. (Please provide the document or template if available).

**SPA Allocation**

3. Number of consultant posts with SPA time and total SPAs allocated.
4. Typical SPA allocation in a 10-PA contract.
5. How many consultant posts have no SPA time allocated?
6. Count of consultants according to the number of SPAs stated in their job plan:
  - <1.0 SPA
  - 1.0–1.4 SPA
  - 1.5–1.9 SPA
  - 2.0–2.4 SPA
  - ≥2.5 SPA
7. Since 1 April 2020, have there been any changes to SPA allocation policy or the standard consultant DCC/SPA split? Yes/No. If yes, please provide any available documentation and briefly outline these changes.

**External Duties**

Royal Colleges, Specialist Associations and National Bodies

Recently refreshed National guidance highlights the need to support professional and national roles within job planning.

8. Does your organisation have a policy or standard approach for recognising external professional duties including but not limited to the following; Roles for Royal Colleges / Faculties, Specialist societies or associations, National clinical networks, guideline groups or NHS national bodies, or Regulatory roles (e.g., GMC, NICE)

Please answer: Yes/No. If yes, provide the policy or a summary.

For consultants who currently hold such external or national duties, please provide the number who:

9. Have allocated PA(s)
10. Are permitted to use existing SPA allocation

11. Undertake these duties in their own time.

#### Protection of SPA time

12. Does the organisation monitor whether planned SPA time is delivered? Yes/No. If yes, please provide a short description of the method.

13. Does the organisation have a policy or guidance on the protection of SPA time (including but not limited to; discouraging routine cancellation or repurposing SPA for service pressures)? Yes/No. If yes, please provide the document.

14. Summary of activities SPA time was used for (e.g. including but not limited to; education, CPD, audit, research, governance, external duties, etc).

#### SPA Time Over the Past Five Years

For each of the past five complete job-planning years, please provide an annual summary showing:

15. Number of consultants with SPA time

16. Total or average SPA time allocated (total SPA PAs or average per consultant).

17. Total or estimated SPA time used in that year.

#### **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 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.

In order to provide you with the information requested for questions 10, 11 and 17, the UHB would be required to undertake a manual trawl of each Consultant job planning record to identify any information that would fulfil these parts of your request, as the information requested is not centrally recorded.

The UHB can confirm that as at 15 April 2026 three hundred and seventeen (317) Consultants were allocated SPA time. 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 Consultants, conducting a search, taking a minimum of five (5) minutes per record, would exceed the 'appropriate limit', costing the UHB the following:

317 @ 5 minutes per record = 26 hours and 18 minutes

26 hours and 18 minutes @ £25 per hour = £657.50

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, this can include assisting a requestor to further refine their request.

Unfortunately, the UHB is unable to provide advice on how you can refine your request. This is due to the UHB still requiring a manual trawl of all Consultant job planning records to be undertaken to identify the information to fulfil your request.

The UHB is withholding the personal information relating to third parties, which includes work email addresses. This decision has been made as it is not within the reasonable expectations of these individuals, that their personal information would be released into the public domain by the UHB as they are no longer employees of the UHB, or their roles are not Senior Management level, redactions have been applied accordingly within Attachment 2. 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.

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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.

Please note: since the last review of Attachment 2, staff members may have changed role within the UHB or have terminated their employment.

Therefore, the UHB provides the accessible information it holds within the attached spreadsheet as requested, at Attachment 1.