

Reference:	FOI.18438.25
Subject:	Ear, Nose and Throat (ENT) Consultants
Date of Request:	25 September 2025

Requested:

I am currently working on a project aimed at identifying ENT Consultants who are actively practicing. I would greatly appreciate it if you could provide me with the following information:

1. Full Name
2. Employment Status (Part-time or Full-time)
3. Type of Position (Permanent or Locum)

Our response

Hywel Dda University Health Board (UHB) has applied an exemption under Section 31(1)(a) of the Freedom of Information Act 2000 (FoIA) to question 2, as it has deemed that the information requested is exempt from disclosure as it would be likely to prejudice the prevention or detection of crime and potentially increase the risk of crime. The UHB has also considered the “mosaic effect”; the harm which will or will be likely to arise from the release of this information, when utilised alongside information already in the public domain.

The UHB is relying upon this exemption as it considers that releasing this information could make the UHB and its staff vulnerable to crime

Section 31 of FoIA is a qualified exemption requiring public authorities to 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: The UHB has a duty to maintain openness and transparency in all its activities, which will help to maintain public trust in the UHB. Disclosing a consultants employment status would provide assurance to the public that it has staff available to provide the medical care required.

Against disclosure: By releasing the information, the UHB would be vulnerable to this being used for crime, which could potentially compromise the security of both UHB staff and its property.

Disclosure of the requested information would reveal working practices and can be used with other information already with the public domain to potentially commit a crime. By disclosing all of the information requested, it could expose the named individuals to fraud attempts or other criminal activity, which could result in the UHB needing to implement disproportionate steps, causing additional expense to the public purse, to counter increased fraud risks that do not currently exist.

Decision: There is a clear public interest in protecting the UHB and its staff from the impact of crime and has considered that the public interest in withholding the information is greater than the interest in disclosing, therefore protecting the UHB from potential criminal activity.

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.

The UHB has identified five (5) ENT Consultants currently employed by the UHB, as recorded on the Electronic Staff Record (ESR) system, and provides the details requested within the table below:

1. Name	2. Employment status	3. Position type
Mr. Antony Howarth	Section 31 exemption applied.	Permanent
Mr. Graeme Jones		Permanent
Mr. Vinod Prabhu		Permanent
Mr. Gianluca Scotta		Permanent
Mr. Faiz Tanweer		Permanent