

Reference:	FOI.17906.25
Subject:	Enteral tube feeding
Date of Request:	25 July 2025

Requested:

1. Does your organisation provide care to individuals aged 0-25 who may use home enteral feeding tubes? Yes/No
2. How many patients has your organisation provided dietetic care for home enteral tube feeding between 01-01-2023-31-12-2024?
 - a. Divided into the following age categories: 0-18, 18-25, 25+ (age when they joined the caseload or age on 01-01-23 if they were on the caseload throughout this period).
 - b. If possible, please provide caseload numbers by age (e.g. <1, 1-2, 2-3... years etc.)
3. Of these, how many individuals use a blended diet*?
 - a. Divided in the following age categories: 0-18, 18-25, 25+
 - b. If possible, please provide caseload numbers by age (e.g. <1, 1-2, 2-3... years etc.)
4. Does your organisation have the following:
 - a. Local blended diet policy – Acute setting (Yes/No)
 - b. Local blended diet policy – Community setting (Yes/No)
 - c. Blended diet guideline (Yes/No)
 - d. Blended diet standard operating guideline or procedure (Yes/No)
 - e. Blended diet training package (Yes/No)
 - f. If yes to 4a-4e, please provide a copy.
5. Are any staff employed by your organisation in roles funded by income provided by an enteral feeding provider (e.g. Nutricia, Abbott)?
 - a. If yes, please state number of posts (whole time equivalent) and Agenda for Change banding.

*A blended diet is the use of everyday foods blended to a puree and given via an enteral feeding tube. This may be used exclusively or in combination with commercial formula.

Please could this be provided in Excel format. I have attached a template for your convenience.

Response:

Hywel Dda University Health Board (UHB) is unable to provide you with all of 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 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 data for questions 2a and 3a broken down by the three (3) age ranges requested, and the caseloads by age for questions 2b and 3b, the UHB would need to undertake a manual trawl of patient medical records to identify the information that would fulfil these parts of your request, as this is not recorded centrally.

The UHB can confirm that it has two hundred and seventy (270) patients receiving dietetic input for home enteral tube feeding, 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 for the twelve (12) month period requested, conducting a search would far exceed the 'appropriate limit', costing the UHB the following:

270 @ 15 minutes per item = 67.5 hours
67.5 hours @ £25 per hour = £1,687.50

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.

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 further. This is due to the UHB still requiring a manual trawl of patient records to be undertaken to identify any information requested.

However, the UHB has provided the accessible information it holds within the attached spreadsheet, as requested, at Attachment 1.

Where the figure in the table in attachment 1 has been replaced with an asterisk (*), the UHB is unable to provide you with the exact number of patients due to the low number of cases (less than 5), as there is a potential risk of identifying individuals if this was disclosed. The UHB is therefore withholding this detail under Section 40(2) of the FoIA. This information is protected by the Data Protection Act 2018 (DPA)/UK General Data Protection Regulations, 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.