

Reference:	FOI.21145 & 21146.26
Subject:	GP Practice purchasing data, policy and assurance
Date of Request:	27 July 2026

Requested:

FOI.21145

Please provide the following data regarding the purchase of clinical diagnostic consumables used internally on-site by General Practices within your Health Board's footprint. This request explicitly excludes community patient prescriptions (e.g., WP10 forms dispensed at community pharmacies) and focuses strictly on stock ordered by or reimbursed for practices for their own point-of-care clinical use.

For each of the last three complete financial years (2023/24, 2024/25, and 2025/26), please provide:

1. Patient Population: The total registered patient population served across all GP practices within your Health Board footprint at the end of each financial year.
2. Diagnostic Purchases (Internal Stock): The total expenditure and total volume (number of packs/strips/units) purchased or reimbursed for use inside GP practices for:
 - a) Blood glucose testing strips / point-of-care blood glucose testing kits.
 - b) Urine glucose testing strips.
 - c) Lancets.

FOI.21146

Please answer the following regarding GP practices within your Health Board's footprint and their stocking of blood glucose testing equipment (meters, strips, lancets):

3. Does the Health Board hold any record of having communicated, reminded, or followed up with GP practices regarding an expectation to stock these diagnostics, including any consideration of the "Lyla's Law" campaign and the associated 2026 CQC guidance change in England requiring blood glucose testing equipment in GP practices, and whether any equivalent expectation has been communicated to practices in Wales?
If so, please provide copies and dates.
4. Has the Health Board's primary care quality/assurance function, or Healthcare Inspectorate Wales in respect of your area, conducted, or does it hold any record of, a check on which practices hold this equipment?
If so, please provide details and the date of any such check.

Response:

Hywel Dda University Health Board (UHB) does not hold all the information for all GP Surgeries. With the exception of the Managed Practices, which are directly managed by the UHB, they are all managed independently. The independent GP Practices hold their own information and consequently, the UHB does not have access to all of the details you require. Therefore, this information would need to be requested directly from the individual GP Practices. The names and addresses of each GP Surgery within the UHB's geographical area is provided at Attachment 1.

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 below the information it holds for the UHB and its six (6) Managed GP practices; Ashgrove Medical Centre, Meddygfa Minafon, Neyland and Johnston Surgery, Meddygfa Penrhyn, Meddygfa Sarn and Tenby Surgery.

The UHB has applied an exemption under Section 43 of the Freedom of Information Act 2000 (FoIA) to the costs requested for question 2 of FOI.21145, as they relate to third parties and disclosure would be prejudicial to their commercial interests. Section 43(2) exempts information, where disclosure would or would be likely to prejudice the commercial interests of any company.

Commercial interests may be prejudiced where disclosure would, or would be likely to:

- Weaken a company's position in a competitive environment by revealing market sensitive information or information of potential usefulness to its competitors
- Damage a company's business reputation or the confidence that customers/users, suppliers or investors may have in it.

This exemption is qualified; therefore, even if information falls within Section 43, public authorities must then 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 public interest in transparency and in the accountability of public funds. Furthermore, it is in the public's interest that public funds be used effectively and that public sector bodies obtain the best value for money when contracting for the provision of products and services. Private sector bodies engaging in commercial activities with the public sector must expect some information about those activities to be disclosed.

Against Disclosure: Disclosure of this information would have a direct impact and cause substantial harm to the suppliers, as it would disclose their pricing and products/services provided to the UHB, and it would be likely that this would damage their ability to work within a highly competitive sector. The information being requested is likely to be used by their competitors to gain a competitive advantage.

Decision: The UHB has considered that releasing the information under the FoIA, to which the UHB is subject, will give an unfair advantage to the suppliers' competitors. The UHB believes that there is wider established public interest in companies not being prejudiced merely because they have contracted with or are bidding to contract with a public sector body, and that there is a public interest in ensuring that there is competition for public sector contracts.

Therefore, the public interest in withholding the costs is greater than the interests in disclosing it and thereby giving unfair commercial advantage to competitors of the company to which this information concerns.

1. The UHB does not hold the information exactly as requested, as it records population data on a quarterly basis. Therefore, the UHB provides within the table below, the patient population registered with a GP practice within the UHB's geographical area, as at 1 April 2024, 2025 and 2026.

Financial year	Number
1 April 2024	401,099
1 April 2025	401,165
1 April 2026	401,340

2. An exemption under Section 43 of the FoIA has been applied to the costs requested. Additionally, the UHB does not hold the information exactly as requested as the GP Practices are required to have two (2) glucose monitor starter kits available for use. However, once a meter has been opened it is given to the patient for their own use and a replacement is ordered. Patients requiring test strips should be provided these on individual patient prescriptions. Therefore, the UHB can confirm that its managed GP practices do not purchase blood glucose testing strips or lancets.

The UHB provides within the table overleaf, the number of urine glucose testing strip products, purchased by the Managed GP Practices, during the 2023/24 to 2025/26 financial years.

Financial year	Urine glucose test strips
2023/24	Box x 2 Pack 25 x 12 Tub x 30
2024/25	Pack 25 x10 Pack 100 x 26 Tub x12 Quantity unknown x1
2025/26	Pack 100 x59

3. The UHB can confirm that an email, with a copy of a letter received from Welsh Government relating to the Diagnosis of Type 1 Diabetes, was disseminated across Primary Care Services, communicating that appropriate capillary glucose testing devices were made available to GP Practices to test for diabetes. Copies are provided at Attachments 2 and 3.

However, the UHB is withholding the personal information relating to third parties. 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 not employed by the UHB, redactions have been applied accordingly within Attachments 2 & 3.

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.

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.

4. The UHB confirms that GP Practices are required to confirm that they have rapid access to calibrated glucometers to diagnose Type 1 Diabetes in a timely manner, as part of their Primary Care annual return submission. The UHB can confirm that five (5) out of the six (6) Managed GP practices have confirmed that they are meeting the requirement. The date of the last annual return was March 2026.