

Reference:	FOI.17842.25
Subject:	Health Boards infrastructure
Date of Request:	17 July 2025

Requested:

Can you please provide an update on your Trust's Infrastructure, including aspects of SaaS, Messaging, and eProcurement? The questions are in the attached spreadsheet, which I would be grateful if you could fill in.

Response:

Hywel Dda University Health Board (UHB) does not hold all of the information requested for questions 3 and 9a of your request, as some of the systems are managed on an All-Wales basis by Digital Health and Care Wales (DHCW) and NHS Wales Shared Services Partnership (NWSSP).

We therefore recommend that you redirect these parts of your request to the Freedom of Information Teams in DHCW and NWSSP, who should be able to help you with your enquiry. Contact details for DHCW and NWSSP are as follows:-

DHCW.FOI@wales.nhs.uk or alternatively in writing to: Digital Health and Care Wales, Ty Glan-yr-Afon, 21 Cowbridge Road East, Cardiff, CF11 9AD.

shared.services@wales.nhs.uk or alternatively in writing to: Information Governance Manager, 4-5 Charnwood Court, Heol Billingsley, Parc Nantgarw, Cardiff, CF15 7QZ.

The UHB has considered applying an exemption under Section 43 of the Freedom of Information Act 2000 (FoIA), as disclosure of the costs requested for questions 2 and 7 relate to third parties, and would be prejudicial to 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 services.

Against Disclosure: Disclosure of this information would have a direct impact and may cause substantial harm to the provider, as it would disclose their pricing, 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 consulted with the third parties, Softcat and Trustmarque, and their comments have been considered as part of the decision-making process for the public interest test. Both have consented to the contract costs being disclosed, and therefore, these will be provided in response to questions 2 and 7.

Additionally, the UHB is unable to provide you with all of the information requested for question 1, 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.

The UHB does not hold a central list of all Software-as-a-Service (SaaS) systems used across the UHB. Therefore, to provide you with the information requested, the UHB would be required to contact all of its teams and services across the UHB and ask them to undertake a trawl of their systems to identify which, if any, are SaaS as this information is not recorded centrally.

The UHB can confirm that it has one hundred and forty-seven (147) services and teams listed on its website. Therefore, contacting each of these services and requesting a search of systems would exceed the 18 hours stipulated within the FoIA. Based on the number of teams that would need to be contacted and the subsequent number of staff members within each team, conducting a search would far exceed the ‘appropriate limit’, costing the UHB the following:

147 @ 15 minutes per item = 36.75 hours
36.75 hours @ £25 per hour = £918.75

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 requester to further refine their request.

Therefore, in relation to the SaaS information requested for question 1, the UHB suggests that it would be able to consider your request further if you were to be more specific and identify the types of systems or service areas you require the information for. Refining your request by providing the names of systems or departments would enable the services to identify whether or not those systems are in use or identify if any further information is held that may fulfil your request.

The UHB has approached its Digital Services team and provides the accessible information it holds to answer the remainder of your request, within the spreadsheet as requested, at Attachment 1.