

Reference:	FOI.20396.26
Subject:	Health Boards Infrastructure
Date of Request:	11 May 2026

Requested:

Can you please provide an update on your Trust's Infrastructure, including aspects of Hardware and Printing?

Response:

Hywel Dda University Health Board (UHB) has applied an exemption under Section 43 of the Freedom of Information Act 2000 (FoIA) to the annual spend requested for questions 4, 5 and 6 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 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 annual spend is greater than the interests in disclosing it and thereby giving unfair commercial advantage to competitors of the company to which this information concerns.

Additionally, the UHB is unable to provide you with all of the information requested for question 4, 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 the suppliers for the standard printers purchased. Therefore, to provide you with the information requested, the UHB would be required to undertake a search of its Oracle system and corresponding invoices to identify the printers purchased. A manual trawl of each record would then be required to identify the suppliers, as this information is not recorded centrally.

The UHB can confirm that it currently has nine hundred and thirty (930) standard printers. It is estimated that a manual search of these records would exceed the 18 hours stipulated within the FoIA. Based on the number of records identified, conducting a search of digital records taking a minimum of five (5) minutes per digital record, would far exceed the ‘appropriate limit’, costing the UHB the following:

930 @ 5 minutes per item = 77 hours and 30 minutes
77 hours and 30 minutes @ £25 per hour = £1,937.50

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.

The UHB suggests that you may refine your request by providing a specific time period e.g. the 2024/25 financial year. However, the UHB would still be required to undertake a manual trawl of invoices for the printers purchased to identify the information required to fulfil your request, therefore, the outcome would be dependent on the number of records identified within the specified time period. A search of the UHB’s Oracle system has been undertaken which identified that forty-three (43) printers were purchased from Advantia during the 2025/26 financial year.

Under Section 16, the UHB provides the accessible information it holds within the spreadsheet as requested, at Attachment 1.