

Reference:	FOI.13384.23
Subject:	Maternity unit deaths
Date of Request:	12 December 2023

Your request and clarification

Please can you provide total numbers recorded within your hospital maternity units during the past five years in the following categories:

1. Number of intrauterine fetal deaths - IUD from viability of 23+ gestation.
2. Number of premature deaths before 37 weeks' gestation – Following birth
3. Number of neonatal deaths - From viability of 23+ weeks.
4. Number of PPROMS (premature prolonged rupture of membranes) babies - Less than 36 weeks' gestation and outcomes.
5. Number of babies admitted into SCBU - Any unexpected admissions into SCBU post 35 weeks' gestation.

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 and the Data Protection (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 information requested for question 4, the UHB would need to undertake a manual trawl of all maternity records, to identify the number of Premature Prolonged Rupture of Membranes (PPROM), as this information is not recorded separately in a central location.

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, the UHB has a duty to provide advice and assistance. Therefore, the UHB provides the accessible information it holds below.

Additionally, the UHB does not hold the information exactly as requested for all remaining questions and will provide the information in the format it is recorded and reported to the Mothers and Babies: Reducing Risk through Audits and Confidential Enquiries (MBRRACE).

An excerpt of the criteria for reporting neonatal deaths to MBRRACE (UK National Report System for Confidential Enquires) is provided below:

- Deaths eligible for notification from 1st January 2013 onwards are:
 - **Late fetal losses** – the baby is delivered between 22⁺⁰ and 23⁺⁶ weeks of pregnancy (or from 400g where an accurate estimate of gestation is not available) showing no signs of life, irrespective of when the death occurred.
 - **Stillbirths** – the baby is delivered from 24⁺⁰ weeks gestation (or from 400g where an accurate estimate of gestation is not available) showing no signs of life.
 - **Early neonatal deaths** – death of a live born baby (born at 20 weeks gestation of pregnancy or later or 400g where an accurate estimate of gestation is not available) occurring before 7 completed days after birth.
 - **Late neonatal deaths** – death of a live born baby (born at 20 weeks gestation of pregnancy or later or 400g where an accurate estimate of gestation is not available) occurring between 7 and 28 completed days after birth.

1. The UHB provides, within the table overleaf, the number of reported late foetal losses and stillbirths of babies over 20 weeks, based on the MBRRACE categories, during the 2019 to 2023 calendar years.

Calendar year	Number
2019	14
2020	13
2021	13
2022	7
2023	6

2. The UHB is unable to provide you with the number of reported premature deaths, broken down by calendar year, due to the low number of cases (5 and under), as there is a potential risk of identifying individuals if this was disclosed. Therefore, the UHB is withholding these details under Section 40(2) of the Freedom of Information Act 2000 (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.

However, the UHB can confirm that there was a total of ten (10) reported premature deaths over 20 weeks, based on the MBRRACE categories, from the 2019 to 2023 calendar years.

3. The UHB confirms that no early neonatal deaths have been recorded or reported to MBRRACE, during the 2019 to 2023 calendar years.

4. Section 12 exemption applied.

5. The UHB provides, within the table below, the number of babies admitted to its Special Care Baby Unit (SCBU), during the 2019 to 2023 calendar years.

Calendar year	Number
2019	121
2020	126
2021	120
2022	134
2023	141