

Reference:	FOI.17301.25
Subject:	Medical Consultants
Date of Request:	3 April 2025

Requested:

Under the Freedom of Information Act 2000, I would like to request the following information regarding all current medical consultants employed by Hywel Dda University Health Board:

- Full name
- Medical specialty
- Primary hospital or site of work
- Professional work email address (e.g. name@wales.nhs.uk)

If individual work email addresses cannot be disclosed due to data protection reasons, I kindly request:

- Generic departmental contact emails, and
- Any official guidance on how to contact specific consultants through their respective departments.

Response:

Hywel Dda University Health Board (UHB) is withholding some of the requested information. The UHB has a right to withhold information in accordance with the Freedom of Information Act (FOIA), and in doing so has applied exemptions under Section 31 and Section 40.

The UHB is unable to provide all of the information requested in relation to Medical Consultants' names, site of work and email address, as it has deemed that this information is exempt from disclosure under Section 31(1)(g) in conjunction with 31(2)(i).

31(1) Information which is not exempt information by virtue of section 30 is exempt information if its disclosure under this Act would, or would be likely to, prejudice -
 (g) the exercise by any public authority of its functions for any of the purposes specified in subsection (2);

31(2) The purposes referred to in subsection (1)(g) are -
 (i) the purpose of securing the health, safety and welfare of persons at work.

The Information Commissioner's Office (ICO) guidance advises that Section 31, amongst other things, prevents information being disclosed that would increase the risk of the law being broken. This exemption is qualified; therefore, even if information falls within Section 31, public authorities must apply the public interest test set out in Section 2(2)(i). 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: The UHB has a duty to maintain openness and transparency in all of its activities. Medical Consultants are patient facing and should be easily accessible to the public to deliver services. Medical Consultants should expect a certain level of information around their work to be accessible to the public whilst working in a patient facing role such as including their names

on letters to patients. In favour of disclosure would be the UHB ethos to deliver open and transparent services by upholding the UHB's organisational values which are to demonstrate:

- Dignity, respect and fairness
- Integrity, honesty and openness
- Caring, kindness and compassion
- Put people at the heart of everything we do
- Working together to be the best we can be
- Striving to deliver and develop excellent services.

There is an expectation that everyone is able to demonstrate a commitment to these values. Commitment to our values supports us in our patient care and continued development as a health care provider.

Against disclosure: The UHB has a duty to secure the health, safety and welfare of their staff at work. By releasing the specific work sites for Medical Consultants this could make them a potential target for criminal activity should a member of the public have a grievance against a particular member of staff. The UHB has a duty of care to its staff to provide a safe place of work. It is reasonable for our staff members to expect to attend a safe place of work without being vulnerable to negative contact from the public. Disclosure of the requested information could make our Medical Consultants feel exposed to negative contact which in turn could impact on their ability to work. Because of the UHB's reliance on its staff, including nurses, doctors and Medical Consultants, any impact to a staff members health and wellbeing could impact on their ability to deliver patient services.

Decision: The UHB considers that the public interest in withholding some of the information requested is greater than the interest in disclosing. Because the UHB has an obligation to protect its staff members health, safety and welfare at work and protect its staff members from potential criminal activity. The UHB has a duty of care to its staff members to provide a safe place of work and staff should expect to be able to attend a safe place of work. Disclosure of the requested information could expose our Medical Consultants to negative contact affecting their mental and or physical wellbeing. Should our Medical Consultants feel compromised this would impact on their ability to work. The UHB relies on its workforce to deliver services including treatment and care to its patients, therefore there is a greater public interest in protecting the wellbeing of staff members within a safe and secure workplace and from being the victim of criminal activity.

A section 40 exemption has been applied to the full names of the Medical Consultants employed by the UHB and their personal work email addresses. Whilst there is an expectation for patients to know the details of the doctor treating them whilst they are receiving care or treatment from the UHB, it is not within the reasonable expectations of our Medical Consultants their personal data held solely for the purpose of their clinical work be released into the public domain and accessible to all. 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 Freedom of Information Act 2000 (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, 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, whilst operating in accordance with the Section 45 Freedom of Information Code of Practice, the UHB has a duty to provide advice and assistance. Therefore, the UHB provides within the table below, the Full Time Equivalent (FTE) number of Medical and Dental Consultants employed by the UHB, broken down by specialty and locality as at the 9 April 2025.

Area Of Work	Locality	FTE
Accident and Emergency	Ceredigion	1
	Carmarthenshire	3.55
	Pembrokeshire	4.2
Anaesthetics	Ceredigion	11.23
	Carmarthenshire	25.63
	Pembrokeshire	11
Blood Sciences	Carmarthenshire	4
	Pembrokeshire	2
Breast Surgery	Carmarthenshire	3
Cardiology	Ceredigion	2
Child and Adolescent Psychiatry	Ceredigion	1.5
	Carmarthenshire	4
	Pembrokeshire	1
Clinical Radiology	Ceredigion	4.8
	Carmarthenshire	9.6
	Pembrokeshire	4.25
Dermatology	Carmarthenshire	1
Education	Carmarthenshire	0.1
Elderly Care Medicine	Pembrokeshire	1
Emergency Services	Carmarthenshire	1
Endoscopy	Pembrokeshire	1
General Medicine	Ceredigion	6.85
	Carmarthenshire	41.48
	Pembrokeshire	11
General Psychiatry	Pembrokeshire	3
	Carmarthenshire	4
General Surgery	Ceredigion	5
	Carmarthenshire	7
	Pembrokeshire	5
Histopathology	Carmarthenshire	6
Informatics	Carmarthenshire	0.4
Learning Disability Mental Health	Ceredigion	0.4
	Pembrokeshire	0.6
Medical Oncology	Ceredigion	2
Medical Ophthalmology	Ceredigion	1
Medicine	Ceredigion	3
	Pembrokeshire	3

Neurology	Carmarthenshire	1
Obstetrics and Gynaecology	Ceredigion	4.5
	Carmarthenshire	12.88
	Pembrokeshire	3
Old Age Psychiatry	Carmarthenshire	3
	Pembrokeshire	1
Ophthalmology	Carmarthenshire	6
Otolaryngology	Carmarthenshire	4
Paediatric Community Child Health	Carmarthenshire	2
Paediatrics	Ceredigion	4.2
	Carmarthenshire	12.35
	Pembrokeshire	5.53
Palliative Medicine	Carmarthenshire	3.4
	Pembrokeshire	0.88
Public Health	Carmarthenshire	2.7
	Pembrokeshire	0.6
Rheumatology	Ceredigion	0.8
	Carmarthenshire	2.6
	Pembrokeshire	2
Sexual and Reproductive Health	Carmarthenshire	1
Sexual and Reproductive Medicine	Carmarthenshire	1
	Pembrokeshire	1
Substance Misuse Psychiatry	Carmarthenshire	1
Trauma and Orthopaedic Surgery	Ceredigion	3.3
	Carmarthenshire	13.63
	Pembrokeshire	5
Urology	Carmarthenshire	5.8
Grand Total		300.73

Additionally, the UHB's Medical Consultants can be written to at the following address:

Glangwili General Hospital,
Dolgwili Road,
Carmarthen,
SA31 2AF