

Reference:	FOI.14164.24
Subject:	Medical devices
Date of Request:	8 April 2024

Requested:

1. Approximately how many medical devices/EBME devices does the trust own?
2. Approximately how many patient beds does the Trust have?
3. Does the trust subcontract the maintenance of medical/EBME devices to an outside provider(s) or does it maintain the devices using internal engineers?
 - a. If an external provider(s) is used, what is the name of the company(s)?
 - b. If an external provider(s) is used, what was the value of the contract when awarded?
 - c. If an external provider(s) is used, what is the contract type – PPM/ Fully- Comprehensive / Ad-hoc support?
 - d. If an external provider(s) is used, what is the contract renewal date(s)?
4. Please provide the name, email address of the role responsible for managing medical devices within the trust
5. If medical device maintenance is managed internally, how many clinical engineers are employed by the Trust?
6. What is the current % of assets 'within service date' – i.e., the date by which a device must be serviced has not expired? (This will be a standard KPI)

Definitions:

Medical Device - A medical device is any device intended to be used for medical purposes. For the purposes of this query, examples such as Anaesthetic machine, patient monitor, Infusion device, ECG Machine etc.

EBME - Electro-Biomedical Engineering, also referred to as Clinical Engineering, Medical Engineering, Biomedical Engineering, MEMS, etc.

PPM - Planned Preventative Maintenance, i.e. annual service.

Fully Comprehensive - Maintenance contract covering the cost of Planned Maintenance and cost of repair parts and labour of equipment.

Ad-hoc support - Subcontracted work to engineering company on an informal basis.

KPI - Key Performance Indicator to measure the performance of a contract or department.

Response:

Hywel Dda University Health Board (UHB) is applying a Section 43 exemption of the Freedom of Information Act 2000 (FoIA), as the contract costs requested in question 3b relate to third parties and disclosure of this information would be Prejudicial to their Commercial Interests. Section 43(2) exempts information, where disclosure of which would or would be likely to prejudice the commercial interests of any persons.

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 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:- It has therefore been decided 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 a public sector body, and that there is a public interest in ensuring that there is competition for public sector contracts.

The UHB considers that the public interest in withholding the contract costs for the external companies used for the maintenance of its medical and Electrical and Biomedical Engineering (EBME) devices, is greater than the interests in disclosing it.

1. The UHB confirms that it owns thirty-one thousand, six hundred and thirty-seven (31,637) medical and EBME devices that are managed by the Clinical Engineering Department.
2. The UHB confirms that it has approximately one thousand, one hundred and thirty-nine (1,139) patient funded beds, excluding flex/surge beds, as at 31 March 2024.
Please note:- the data provided is as recorded on the monthly bed complement; however, this is dependent on the data being provided accurately and in a timely manner from all sites across the UHB.

3. The UHB confirms that it subcontracts the maintenance of its medical/EBME devices to both outside providers and internal engineers.
 - a. The UHB provides the names of the external companies used for the maintenance of its medical/EBME devices, as recorded by the Clinical Engineering Department, at Attachment 1.
 - b. Section 43 exemption applied.
 - c. The UHB provides, within the table overleaf, the contract types it has with its external providers.

Contract type	Number
All job types	12
Comprehensive	105
Planned Preventative Maintenance (PPM) only	52
PPM and repair	4

- d. The UHB provides the contract renewal dates for the maintenance of its medical/EBME devices, as recorded by the Clinical Engineering Department, at Attachment 1.
4. The UHB does not have a specific person responsible for all medical devices. However, the UHB provides below, the name, job title and email address of those individuals with responsibility for medical devices across the UHB.
 - Clinical Engineering devices - Jon Wilson, Head of Clinical Engineering
Email: jon.wilson@wales.nhs.uk
 - Radiology asset management - Gail Roberts-Davies, Head of Radiology
Email: gail.roberts-davies2@wales.nhs.uk
 - Theatre devices and tools - Diane Knight, Service Delivery Manager for Theatres
Email: diane.knight2@wales.nhs.uk
 - Endoscopy Flexi Scopes- Sara Edwards Service Delivery Manager - Endoscopy & Gastroenterology
Email: sara.edwards@wales.nhs.uk
 - Pathology Point of Care Testing (POCT) devices - Dylan Jones, Head of Pathology Service
Email: dylan.jones2@wales.nhs.uk
 - Podiatry Orthoptic medical devices – Mike Mulroy, Head of Podiatry
Email: mike.mulroy@wales.nhs.uk
 - Cardiology Implantable medical devices – Paul Smith, Service Delivery Manager
Email: paul.smith8@wales.nhs.uk

5. The UHB confirms that it currently employs 26.06 Whole Time Equivalent (WTE) clinical engineers.
6. The UHB confirms that its KPI for all medical device assets within service date is 62%; this includes all in use devices, and not just those owned by the UHB.