

Reference:	FOI.20232.26
Subject:	Patient confidentiality breaches
Date of Request:	20 April 2026

Requested:

Follow up to FOI.19618.26

The information provided to me does not include the data for 25/26. Please can you include this data.

1. The total number of patient confidentiality breaches (including data breaches or unauthorised disclosures of patient information) recorded in the 2025/26 financial year.
2. A breakdown of these breaches by financial year.
3. Where recorded, the general category of breach (for example: human error, lost paperwork, IT-related incident, unauthorised access).
4. The number of breaches in each year that were reported to the Information Commissioner's Office (ICO).
5. The number of members of staff who were formally investigated for an alleged breach of patient confidentiality in each of the last five financial years.
6. Where recorded, the number of those investigations that resulted in:
 - No further action
 - Informal action or retraining
 - Formal disciplinary action

Response:

Hywel Dda University Health Board (UHB) is unable to provide you with all the information requested for questions 1 to 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 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 identify patient confidentiality breaches only, the UHB would need to undertake a manual trawl of all breaches recorded across two (2) systems, for the 2025/26 financial year, to identify any information that may fulfil these parts of your request, as the information is not recorded in an easily accessible manner.

The UHB can confirm that eight hundred and seventy (870) data breaches were recorded, for all reasons, during the 2025/26 financial year. It is estimated that a manual search of these records would exceed the 18 hours stipulated within the Freedom of Information Act 2000 (FoIA). Based on the number of records identified, conducting a search taking a minimum of five (5) minutes per digital record, would exceed the 'appropriate limit', costing the UHB the following:

870 @ 5 minutes per record = 72 hours and 30 minutes
72 hours and 30 minutes @ £25 per hour = £1,812.50

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, 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 requestor to further refine their request.

Unfortunately, the UHB is unable to provide advice on how you can refine your request further. This is due to the UHB still requiring a manual trawl of all data breach records to be undertaken to identify the circumstances of the breach.

1. The UHB confirms that a total of eight hundred and seventy (870) data breaches were recorded, for any reason, during the 2025/26 financial year.
2. The UHB provides within the table below, the number of data breaches recorded, for any reason, by hospital/site during the 2025/26 financial year.

Hospital/site	Number
Bronglais General Hospital	71
Glangwili General Hospital	216
Prince Philip Hospital	79
Withybush General Hospital	133
UHB wide/other sites	371
Total	870

3. The UHB provides below, a list of the categories used to record the type of breach:
 - Cyber related
 - Disclosed in error
 - Disclosed in error electronic
 - Disclosed in error paper
 - Disclosed in error verbal
 - Lost in transit
 - Lost or stolen hardware
 - Lost or stolen paperwork
 - Misfiling electronic
 - Misfiling paper
 - Non-secure disposal paperwork
 - Not applicable
 - Other
 - Technical failing
 - Unauthorised access/disclosure
 - Uploaded to web in error
4. The UHB is unable to provide you with the information requested, due to the low number of cases (less than 5), 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 (UK GDPR), 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.

5. & 6. The UHB does not hold the information exactly as requested, as it records this data in calendar years not financial years. However, the UHB has applied an exemption under Section 21 of the FoIA, as the information for the 2025 calendar year is accessible by another means. The information was provided to you in response FOI.19618.26, issued on 16 March 2026.