

Reference:	FOI.12925.23
Subject:	Pharmaceutical companies
Date of Request:	18 October 2023

Requested:

1. Did Hywel Dda University Health Board, formerly Dyfed Health Authority, receive financial donations or incentives from pharmaceutical companies for using Factor VIII and Factor IX blood products between the period 1975 and 1992? These pharmaceutical companies would have included, but not limited to, Armour, Alpha, Bayer, Cutter, Speywood, Baxter, Travernol.
2. Please provide a detailed breakdown of the donation by the name of the pharmaceutical company, the pharmaceutical product, the total amount donated, conditions of the donation, and the date of the donation.
3. Please provide any relevant correspondence between the Health Authority and the pharmaceutical companies if available.

Response:

Hywel Dda University Health Board (UHB) is unable to provide you with 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.

The UHB has been through many changes since 1975, including seven (7) organisational name changes, and during the period requested, few records were recorded electronically. Therefore, in order to provide you with the information requested, the UHB would be required to undertake extensive searches of all of its archives, across several sites, to determine if any of the requested information is held.

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.

For your information, the current document retention guidance recommends a minimum retention period for contracts of fifteen (15) years after the end of contract and for donations, six (6) years after the donation.

However, the Infected Blood Inquiry wrote to NHS Wales on 5 July 2018 requesting that any records relating to the Inquiry were not destroyed, even if they were beyond the minimum retention period. For ease of reference, a link to the letter has been provided below:

[Letter to CE Public Health Wales \(infectedbloodinquiry.org.uk\)](https://infectedbloodinquiry.org.uk/letter-to-ce-public-health-wales)

As explained in the Section 12 exemption above, the UHB may hold some paper records. However, to determine if and where these records may be held, would exceed the 18 hours permitted.