

Reference:	FOI.20615.26
Subject:	Previous service
Date of Request:	4 June 2026

Requested:

Please provide the following information for the period 1 January 2020 to the present:

1. Copies of any policies, procedures, guidance documents, recruitment guidance, manager guidance, HR advice notes or other documents relating to:
 - Recognition of continuous service.
 - Recognition of previous public sector service.
 - Recognition of service with organisations outside NHS Wales.
 - Application of the NHS Wales Protocol for Recognising Continuous Service.
 - Determination of annual leave entitlement based on previous service.
2. A list of all organisations whose previous service has been recognised by the Health Board for any employment-related purpose during the above period, including but not limited to:
 - Annual leave entitlement.
 - Occupational sick pay.
 - Occupational maternity pay.
 - Redundancy calculations.
 - Incremental credit on appointment.
 - Other contractual employment benefits.
3. For each organisation identified in response to Question 2, please provide:
 - The organisation name.
 - The benefit or entitlement for which service was recognised.
 - The number of employees whose service has been recognised.
 - The policy, protocol, discretion or legal basis relied upon.
4. For each organisation identified in response to Question 2, please provide the number of:
 - Approved requests.
 - Refused requests.
 - Partially approved requests.
 - Appeals
5. Please provide a list of all organisations which the Health Board regards has recognised for the purpose of the NHS Wales Protocol for Recognising Continuous Service or any associated local policy.
6. Please confirm whether service with the following organisations may be recognised and, if so, for which purposes:
 - UK Government departments (including the Ministry of Defence).
 - Civil Service employers.
 - Local authorities.
 - Police forces.
 - Fire and Rescue Services.
 - Welsh Government.

- Universities.
- Further education colleges.
- Armed Forces service.
- Other NHS bodies outside Wales.

7. Please provide copies of any business cases, briefing papers, legal advice summaries, management guidance or reports that have informed the Health Board's approach to recognising previous service from organisations outside NHS Wales.

8. If the Health Board maintains a list of recognised organisations for the purpose of continuous service or annual leave calculations, please provide a copy of that list.

Response:

Hywel Dda University Health Board (UHB) does not hold all the information requested as it only recognises annual leave and incremental credit as part of continuous service.

Additionally, the UHB does not hold any policies or guidelines relating to continuous service, prior to the implementation of the All-NHS Wales Protocol for Recognising Continuous Service on 17 February 2026.

Furthermore, the UHB is unable to provide you with all 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 (Appropriate Limit and Fees) Regulations 2004. The "appropriate limit" represents the estimated cost of one person spending 18 hours (or 2 ½ working days) in determining whether the UHB holds the information, and locating, retrieving and extracting the information.

In order to identify all of the information requested for questions 1, 2, 3, and 4, the UHB would be required to undertake a manual trawl of the personal records of those recruited during the requested time period, to identify any information that would fulfil these parts of your request, as not all the data is not centrally recorded.

The UHB can confirm that nine thousand, two hundred and forty (9,240) staff were recruited, during the 2020 to 2025 calendar years and the period 1 January to 4 June 2026. 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 of digital records taking a minimum of five (5) minutes per digital record, would far exceed the "appropriate limit", costing the UHB the following:

9,240 @ 5 minutes per record = 770 hours
770 hours @ £25 per hour = £19,250.00

The UHB is therefore applying an exemption under Section 12 of the 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, which can include assisting a requestor to further refine their request.

The UHB suggests that you may refine your request by reducing the timeframe requested to a six (6) month period. However, the UHB would still be required to undertake a manual trawl of all personal records of those recruited during the shorter time period, to identify the information to fulfil your request. Therefore, the outcome would be dependent on the number of records identified within a shorter time period.

The UHB has also applied an exemption under Section 21 of the FoIA to questions 1, 6, 7 and 8 as the information requested is already in the public domain and is accessible by another means. The relevant hyperlinks have been provided at each question within the response.

Additionally, the UHB is unable to provide you with the number of appeals for question 4, due to the low number (less than 5) and have therefore, replaced the figures in the tables with an asterisk (*), as there is a potential risk of identifying individuals if this was disclosed. The UHB is therefore withholding this detail under Section 40(2) of the 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.

1. The All-NHS Wales Protocol for Recognising Continuous Service is an appendix to Policy 042 - Starting Salaries Policy which is available on the UHB's website. A link to the UHB's written control documents webpage has been provided below:

[Policies and written control documents - Hywel Dda University Health Board](#)

2. Since the implementation of the All-NHS Wales Protocol for Recognising Continuous Service on 17 February 2026 the UHB can confirm it has not received any applications for additional annual leave relating to continuous service. Therefore, the UHB does not hold the requested information for the period 17 February to 4 June 2026. An exemption under Section 12 has been applied to applications received prior to this as the information is not recorded centrally and a manual trawl of records would be required.
3. Please see response to question 2.
4. The UHB provides within the table below the number of incremental credit application requests that were approved, refused, partially approved and appealed, during the period 1 June 2025 to 31 May 2026. The UHB only holds data centrally for the most recent twelve (12) month period.

Request	Number
Approved	74
Refused	25
Partially approved	0
Appealed	*

5. Please see response to question 2.

6. The UHB utilises the list of organisations provided by Welsh Government (WG) when considering continuous service applications for annual leave. A link to the relevant webpage has been provided below:

[Organisations | In service | GOV.WALES](#)

7. Please see response to question 1.

8. Please see response to question 6.