

Reference:	FOI.18918.25
Subject:	Agency and bank spend
Date of Request:	25 November 2025

Requested:

1. I am writing to request a detailed breakdown of Medical Agency spend for the following periods:

- 1st April 2024 – 31st March 2025
- 1st April 2025 – 31st October 2025

Please provide the data in Excel format, including the following details for each month:

- a. By grade, specialty, and sub-specialty
- b. For each hospital
- c. Split by framework and non-framework agencies

2. I am also requesting a detailed breakdown of Medical Bank spend for the following periods:

- 1st April 2024 – 31st March 2025
- 1st April 2025 – 31st October 2025

Please provide the data in Excel format, including the following details for each month:

- a. By grade, specialty, and sub-specialty
- b. For each hospital
- c. Split by framework and non-framework agencies

Response:

Hywel Dda University Health Board (UHB) is withholding the staff grade requested for question 1 as along with the other information being disclosed could enable the identification of the individuals, which in turn could result in the disclosure of personal information specifically and individual's income. This decision has been made as it is not within the reasonable expectations of these individuals that their personal information would be released into the public domain by the UHB. 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 (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 UHB does not hold the sub-specialty requested. However, the UHB provides the information it does hold, which is not covered by the Section 40 exemption, within the spreadsheet as requested, at Attachment 1.

2. The UHB does not hold the requested information as it does not have a Medical and Dental (M&D) bank.