

Reference:	FOI.17845.25
Subject:	Therapy and Community Rehabilitation services
Date of Request:	17 July 2025

Requested:

Under the Freedom of Information Act 2000, I am requesting the following information regarding your Therapy and Community Rehabilitation services, including Occupational Therapy, Physiotherapy, Speech and Language Therapy, and Dietetics:

1. Are any of these services currently delivered by external providers through:
 - Insourcing
 - Outsourcing
 - Subcontracting

2. For each external provider currently engaged, please provide:
 - a. Name of the provider
 - b. Type of engagement (insourced, outsourced, subcontracted)
 - c. Service(s) provided
 - d. Contract start date
 - e. Contract end date or review date
 - f. Annual contract value or total spend to date
 - g. Volume of activity delivered (e.g. number of patients seen, sessions delivered, or hours worked)
 - h. Performance metrics or KPIs, if available
 - i. Was the contract awarded via a framework or open tender? If so, please specify which framework (e.g. NHS SBS, HealthTrust Europe, etc.).

3. Who is the internal lead responsible for managing these contracts? Please provide their job title and department.

4. Who do the external providers report into operationally within your organisation? (e.g. Clinical Lead, Service Manager)

5. Are there any current or upcoming plans to procure additional external support for these services in the next 12 months?

6. Have you experienced any challenges in meeting waiting time targets or service demand in these areas over the past 12 months?

Response:

Hywel Dda University Health Board (UHB) has applied an exemption under Section 43 of the Freedom of Information Act 2000 (FoIA) to the contract costs requested for question 2f, as they relate to a third party and disclosure would be prejudicial to their commercial interests. Section 43(2) exempts information, where disclosure would or would be likely to prejudice the commercial interests of any company.

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 supplier, 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: The UHB has consulted with the third party, Nutricia, and have taken their comments into consideration. The UHB has therefore decided that releasing the information under the FoIA, to which the UHB is subject, will give an unfair advantage to the provider's 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 question 2f, is greater than the interest in disclosing it, as it is anticipated that disclosure of the information would be likely to give unfair commercial advantage to competitors of the company concerned.

However, whilst operating in accordance with the Section 45 Freedom of Information Code of Practice, the UHB has a duty to provide advice and assistance and provides the information it holds below.

The UHB can confirm it does not insource, outsource or sub-contract any Occupational Therapy, Physiotherapy or Speech and Language Therapy services. However, the UHB does have some Service Level Agreements (SLA) between the Local Authorities (LAs) and health providers.

1. The UHB outsources home enteral feeding products and supplies via a contract with Nutricia, within this contract they also fund nutrition nurses who provide home enteral feeding care to community patients.
2. The UHB provides within the table overleaf further detail of the Nutricia contract held.

a.	Name of Provider	Nutricia
b.	Type of engagement	Outsourced
c.	Services provided	Supply Nutritional supplements, feeding pumps and ancillaries to patients under the care of the UHB Dietetic service. Provide community nursing resource. Provide training to staff and patients regarding home enteral feeding.
d.	Contract start date	1 February 2018
e.	Contract end date or review date	Contract was up for renewal in 2022 which has been continually extended. A new contract currently under tender.
f.	Annual contract value or total spend to date	Section 43 applied.
g.	Volume of activity delivered	The volume of activity is difficult to articulate as it includes a variety of activity such as training, tube changes, oral and enteral feed supplies, patient reviews etc. However, an example of monthly activity is provided below: <ul style="list-style-type: none"> • Approximately twenty-five (25) tube changes • Eight to ten (8-10) training sessions • One hundred and forty (140) patient reviews • Approximately ten (10) helpline calls
h.	Performance metrics or KPIs	Enteral feeding home delivery performance status data, including: <ul style="list-style-type: none"> • Number of home deliveries • Hospital Deliveries • First deliveries Data includes KPIs against those items delivered in full, on time, volume short fall in units, volume shortfall (%). Data summary to include order vs delivery, ordered singles (items), delivered singles (items), those delivered in full (as a %). Customer service response times (call centre) against delivery performance status. Including: <ul style="list-style-type: none"> • All inbound calls from patient, health care professional and prescription line. • Call answer time (for the above) • Complaints (number of complaints vs KPI) Annual monetary value provided by contract provider, broken down as follows (for home enteral feeding service): <ul style="list-style-type: none"> • All ancillary items • Feeding pumps • Same day deliveries • Holiday deliveries • 13 deliveries per year • Estimated nurse value

		<p>Hospital service:</p> <ul style="list-style-type: none"> • Feed – tube feed • Feed – ONS/thickeners • All ancillary items • Feeding pumps • Other items <p>A bimonthly contract review meeting is held, which includes Managers and representatives from the Procurement and Finance departments, during which figures are reported and issues/concerns are raised.</p>
i.	Was the contract awarded via a framework or open tender?	<p>The contract was awarded via a framework, procured by the Procurement Team in NHS Wales Shared Services Partnership (NWSSP) via Welsh Government's (WG) Sell2Wales website. A link to the notice has been provided below:</p> <p>View notice - Sell2Wales.</p>

3. The UHB confirms that the service lead is Sarah Roberts, Deputy Head of Nutrition and Dietetics.
4. The UHB confirms that the external provider, Nutricia, reports to Sarah Roberts, Deputy Head of Nutrition and Dietetics and Paul Makin, Clinical Lead Community Dietitian.
5. A request for additional staffing budget to be provided via this contract has been submitted. However, the contract is currently out to tender.
6. The UHB's Dietetics department have experienced challenges regarding provision of supplies over the past 12 months.