

**Freedom of Information Act 2000 - Request Reference Fol/21/220**  
**Information Governance**

**Request details**

- 1. Name of SIRO / Senior Information Risk Owner, or equivalent. A name and job title, or if they are below the disclosable level just a job title is fine.**

David Thomas, Director of Digital & Health Intelligence

**If you do not have a nominated SIRO could you please answer Q1 with the person(s) with responsibilities equivalent to a SIRO.**

**“A Senior Information Risk Owner (SIRO) is an Executive Director or member of the Senior Management Board of an organisation with overall responsibility for an organisation's information risk policy. The SIRO is accountable and responsible for information risk across the organisation. They ensure that everyone is aware of their personal responsibility to exercise good judgement, and to safeguard and share information appropriately.”**

- 2. Contact email for answer to Q1.**

In relation to your request for a UHB email address, Cardiff and Vale University Health Board (the UHB) is withholding this information, relying on Section 31 (1) (a) of the Freedom of Information Act 2000 (prevention and detection of crime). Specifically, the UHB believes that disclosing details regarding its ICT infrastructure, or support of that infrastructure, would be likely to prejudice the prevention of crime, particularly cyber-crime. As this is a qualified exemption, the UHB is required to complete a public interest test in deciding whether it is in the public's interest to withhold or disclose the information.

**Public Interest Test:**

**In favour of disclosure**

The UHB recognises there is a public interest in transparency and accessibility.

**Against disclosure**

There is a very strong public interest in protecting the extremely sensitive data held by the UHB. Cyber Security and the associated Cyber-Risk / Cyber-Attacks represent a rapidly evolving arena that becomes more complex and dangerous with time. Disclosure of email addresses increases vulnerability to security attacks, spam and phishing.

**Decision**

The UHB considers that the public interest in withholding the information sought is significantly greater than any interest there may be in disclosing it and potentially exposing

sensitive personal data to an increased level of risk. The UHB strongly believes that posing additional unnecessary risk to the UHB, and consequently patient care and safety, would be unacceptable to the public. Whilst the UHB acknowledges a public interest in transparency and accessibility, the UHB provides appropriate accessibility information via its website. It was therefore decided that it was not in the public's interest to disclose this information.

In accordance with our Section 16 obligation, the duty to provide advice and assistance, please find the below link to the 'Contact the UHB' page of the UHB's website.

<http://www.cardiffandvaleuhb.wales.nhs.uk/contact-us-page>

After considering your request, the UHB believes that the data requested is classed as personal data as defined under the General Data Protection Regulation (GDPR) and Data Protection Act 2018 and its disclosure would be contrary to the data protection principles and constitute unfair and unlawful processing in regard to Articles 5, 6, and 9 of GDPR. We are therefore withholding this detail under Section 40(2) of the Freedom of Information Act 2000. This exemption is absolute and therefore there is no requirement to apply the public interest test.

**3. Name of Data Protection Officer.**

James Webb

**4. Contact email for DPO.**

[UHB.DPO@Wales.NHS.UK](mailto:UHB.DPO@Wales.NHS.UK)

**5. Do you have Information Asset Owners appointed?**

Yes, approximately 60

**6. Who would be responsible for organising training IAO's (If appointed)**

Information Governance Department