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University Health Board

**Freedom of Information Act 2000 - Request Reference FoI/21/538**  
**Telephony Systems**

**Information Requested:**  
**Telephony and UC/ Collaboration**

- Please confirm the manufacturer of your telephony system(s) that are currently in place  
Mitel
- When was the installation date of your telephony equipment?  
Feb 2008
- When is your contract renewal date?
- Who maintains your telephony system(s)?
- Please confirm the value of the initial project
- Please confirm the total ongoing annual spend on telephony
- Please confirm the annual support cost for your telephony system
- Do you use Unified Communications or Collaboration tools, if so which ones?

After considering your request, Cardiff and Vale University Health Board (the UHB) considers this information to be exempt from disclosure under the Freedom of Information Act 2000 (Section 43) Commercial Interests. This section of the Act sets out an exemption from the right to know if:

- the information requested is a trade secret, or
- release of the information is likely to prejudice the commercial interests of any person. (A person may be an individual, a company, the public authority itself or any other legal entity).

This exemption was considered by the UHB when deciding whether to disclose information because it considered that in doing so there could be a significant risk in prejudicing the commercial interests of both Cardiff University and the UHB. 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.

**In favour of disclosure:** There is a public interest in transparency and in the accountability of spending 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.





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**Against disclosure:** It has been established that releasing the information sought under the Freedom of Information Act, to which the UHB is subject, will give an unfair advantage to the supplier's competitors. There is a risk of disclosure prejudicing the commercial interests of the UHB by affecting its bargaining position with suppliers. This in turn could lead to less effective use of public funds in future. The UHB believes that there is wider established public interest in suppliers not being prejudiced merely because they have contracted with a public sector body (as upheld in ICO decision notice FS50473543 ICO v Royal Marsden Hospital Trust).

**Decision:** The UHB considers that the public interest in withholding the information is greater than the interests in disclosing it and thereby giving unfair commercial advantage to competitors of the supplier to which this information concerns. The UHB believes that disclosure of information in a manner which fails to protect the interests and relationships arising in a commercial context could have the effect of discouraging companies from dealing with the Health Board because of fears that the disclosure of information could damage them commercially. In turn this could then jeopardise the Health Board's ability to compete fairly and pursue its function to bring forward development in the area and obtain value for money. It was therefore decided that it was not in the public's interest to disclose this information.

### Contact Centre

- Please confirm the manufacturer of your contact centre system(s) that are currently in place?
- When was the installation date of your contact centre infrastructure?
- When is your contract renewal date?
- Who maintains your contact centre system(s)?
- Please confirm value of the initial project?
- Please confirm the value of annual support/maintenance services (in £)? And overall annual spend for the contact centre
- How many contact centre agents do you have?
- Do agents work from home? Or just your offices?
- Do you use a CRM in the contact centre? What platform is used?
- Do you use a knowledge base / knowledge management platform? What platform is used?

Please see above.

### Connectivity and Network Services

- Who provides your WAN and internet connectivity and the annual spend on each
- Have you, or do you plan to deploy SD Wan services
- Have you got SIP trunks, if so who from and confirm annual spend?





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- Please confirm who provides your LAN, WIFI and Security infrastructure
- Please confirm your annual spend on each
- Please confirm your data centre switching and security infrastructure and have you deployed cloud based security and threat management

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 in public authorities demonstrating that their systems effectively protect personal data.

**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. Releasing details of the UHB's ICT infrastructure into the public domain significantly reduces its capacity to manage this threat to the stated public interest by exposing potential vulnerabilities.

**Decision:** The UHB considers that the public interest in withholding the information 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 viewed as an unacceptable risk by the public. Whilst the UHB acknowledges a public interest in providing assurances of effective protection of personal data, it believes the most effective means of increasing public confidence in data protection is to successfully protect the data itself. The UHB considers its responsibility to protect the personal data of patients and staff to be of the highest importance. It was therefore decided that it was not in the public's interest to disclose this information.

#### **Organisation**

- How many employees do you have overall within your organisation?

In completing a search for the information requested, Cardiff and Vale University Health Board (the UHB) has confirmed that this information is not centrally recorded or collated. To retrieve the information requested would require a manual search through individual records and the





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UHB considers that this would exceed the limit set within regulations for responding to a request. The UHB has therefore relied upon the Section 12 exemption ('Exemption where cost of compliance exceeds appropriate limit') of the Freedom of Information Act 2000 and is refusing your request.

The UHB has estimated that to complete the work needed to respond to this request would exceed the time limit as set within regulations to respond to a Freedom of Information Act request. Under the Act there is an allowance of two and a half days, or 18 hours, to comply with a request and the cost limit set within the fees' regulations for this amount of work (18 hours) is £450 for the UHB. The fees regulations specify that the cost of complying with a request must be calculated at the rate of £25 per hour.

- Can you provide contact details for your procurement lead / category manager for these services?
- Can you provide names and contact details for the following people within your organisation?
- CIO / IT Director
- Head of IT
- Head of Digital Transformation
- Head of Customer services

Please note some of these posts do not exist within the UHB as they are named above. Under our Section 16 obligation to provide advice and assistance, I would like to inform you the UHB publishes information on certain senior roles via the following page of its website:

<https://cavuhb.nhs.wales/about-us/our-board/our-board-members/>

In addition to this, please note the following roles:

Allan Wardhaugh, Chief Clinical Information Officer  
Angela Parratt, Director of Digital Transformation

