

Freedom of Information Act 2000 – Request Reference FoI/24/010
Ambulatory Electrocardiogram Recording

Under the Freedom of Information Act 2000, I am requesting information on your Trust's usage of ambulatory electrocardiogram (EKG or ECG) Holter monitors and associated software for analysis reporting.

Specifically, could you please provide answers to the following questions:

1. Does the Trust use ambulatory electrocardiogram (EKG or ECG) Holter monitors? (Yes or No)

Yes.

1(i) If "Yes" then which make and models are currently in use and how many of each are currently deployed?

60 Spacelabs Lifecard CF, 7 Novacor R.Test.

1(ii) If "No" then does the Trust intend to implement ambulatory electrocardiogram (EKG or ECG) Holter monitoring in the near future? (Yes or No)

Not applicable.

2. Does the Trust use software to read EDF reports? If ""Yes"" then which vendor(s) are used?

No.

3. Does the Trust use an external ECG Interpretation Provider. If ""Yes"" then which vendor(s) are used?

No.

4. How many ambulatory electrocardiogram ECG readings does the Trust perform each year?

Approximately 3,500 readings.

5. What is the split of the ambulatory ECG reading volumes in question 5, by length of recording? (e.g. 24hr, 48h, 72h, 7-day, 14-day)

Approximately 75 per cent for 24 to 72 hours, and approximately 25 per cent for 7 to 14 days.

6. In what environment are the ambulatory ECG holters fitted? (e.g. secondary care, community diagnostic centre [CDC], primary care)

Secondary and tertiary care.

7. What is your preferred buying method for these devices? (e.g. Direct, Supply Chain, Other)

Cardiff and Vale University Health Board (the UHB) does not hold this information. The Freedom of Information Act 2000 grants individuals the right of access to information which exists at the moment of request, it does not require public bodies to create new information which does not already exist in the form of opinions or judgements.

8. How much did the Trust pay for its currently deployed ECG Holter devices and software (per device), and what costs are associated with maintenance, such as battery replacement, servicing etc?

After considering your request, the UHB considers this information to be exempt from disclosure under section 43 of the Freedom of Information Act 2000 ('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 the supplier 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.

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 is not in the public's interest to disclose this information.

9. Does the Trust have service contracts for the currently deployed ambulatory ECG devices. If so, how much is this per annum for the different brand of devices by vendor(s)?

Yes, the UHB has service contracts. However, in respect of the contract values, the UHB believes the section 43 exemption to apply and is therefore withholding information.

10. How many ambulatory ECG monitors did the Trust purchase in 2020, 2021, 2022 and 2023 per make and model of Holter monitor?

In 2020, there were 7 Spacelabs Lifecard CF models. In 2021, there were none. In 2022, there were 20 Spacelabs Eclipse monitors along with an upgrade of the entire system – though this is still awaiting installation. In 2023, there were 15 Spacelabs Lifecard CF models to be swapped for Eclipse monitors once upgrade installation was completed.

11. What is the Trust's wait time for ambulatory ECG Holter Fittings and ECG reporting?

13 weeks as at 2 February 2024.

12. Is the Trust meeting their targets for ambulatory ECG recording volumes and patient waiting times? (Yes or No)

No.

13. What are the Trusts biggest challenges for cardiology ECG ambulatory recordings?

The UHB does not hold this information.

14. Is the Trust considering purchasing any new ambulatory ECG Holter monitors? For replacement of old devices, broken devices, or needing more equipment?

No.

15. Who is the Trust's senior electrophysiologist or cardiology manager and what are their contact details? (Name, position, email, telephone)

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. Its disclosure would be contrary to the data protection principles and constitute unfair and unlawful processing with regard to Articles 5, 6, and 9 of the 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.