



**GIG**  
CYMRU  
**NHS**  
WALES

Iechyd Cyhoeddus  
Cymru  
Public Health  
Wales

## Freedom of Information request to Public Health Wales

<b>FOI Reference:</b>	<b>FOI 510</b>
<b>Date request received</b>	<b>12<sup>th</sup> November 2020</b>
<b>Date information is due to be sent</b>	<b>10<sup>th</sup> December 2020</b>

### Information Requested:

I wish to submit a request for some of the organisation's information around the internal plans and strategy documents around ICT.

The ICT documents I require is the most recent update.

I wish to obtain the following documents:

1. ICT/IM&T/IS Strategy- The IT department strategy or plans, highlights their current and future objectives.
2. ICT Org Chart- A visual document that presents the structure of the IT department, please include name and job titles. If this cannot be sent, please work towards a structure with job titles.
3. ICT Annual or Business Plan- Like the ICT strategy but is more annually focused.
4. ICT Capital Programme/budget- A document that shows financials budget on current and future projects.

If some of these documents are not valid, please state when the 2020 ICT documents are planned to be published.

Please do get back to me if you have further questions or feedback.

## Information provided for the answer:

Thank you for your recent request.

1. The digital vision and strategy is being written and will be delivered in 2021. This will be in keeping with the rapid growth of digital technologies during the pandemic.
2. The Informatics structure is currently being revised and will be under consultation over the next few weeks. We would be happy to share the final version once agreed and published. The Head of Service is Drew Evans.
3. The business plan is integrated into the PHW annual plan. Please find below an extract from our Operational Plan:-

### 2.4.1 Digital Strategy

Creating and delivering a digital strategy will entail co-creating and developing a Digital Vision and Strategy with stakeholders, partners and users. Producing a detailed, phased strategic delivery plan, including the priorities to be delivered during 2021/22 and outlining the phasing in future years. This will be underpinned by effective engagement across the organisation, including user workshops to embed digital thinking, ambition and drive across the organisation.

The scope of the strategy will span the organisation; interaction with our partners in other public sector organisations; service delivery partners; service users and members of the public. The IM&T Team will be critical to developing the strategy which will need to take account of the demand of the organisational response to the pandemic.

The scope of the strategy is likely to cover:

- ❖ **infrastructure and cloud improvements:** the foundation level, which will look to optimise costs, operational processes, stability and agility of operations
- ❖ **application innovation:** the focus will be on placed on the applications that Public Health Wales uses, APIs, and transactional data that supports the “customers”.
- ❖ **data-driven innovation:** the need to have a strong foundation in data and how this used in new products.

We will be seeking to make data securely accessible, enabling greater inter-operability with other systems to enable greater data driven decisions in real-time taking advantage of artificial intelligence and machine learning technologies where appropriate. This will enable the organisation to be more agile; provide greater flexibility for our staff to collaborate and work seamlessly from any location; and deliver a greater digital engagement experience with the wider public and our own staff to ensure we remain connected and committed to our goals and vision.

Milestone	Delivery Date
Digital Strategy overall approach agreed	31/03/21
Digital Strategy published	31/07/21
Digital Strategy Delivery Plan developed	31/08/21

4. Due to the pandemic the capital programme is determined by the capital programme board. We have projected our replacements and essential changes for up to 3 years and this is currently not yet finalised.

I am unable to provide information relating to current contracts although I can confirm that this information is held.

Public Health Wales does not respond to questions regarding its information security arrangements and we therefore engage the following exemption under the Freedom of Information Act 2000.

Section 38(2) – Health and Safety of the Act – which states that:

*38(1) Information is exempt information if its disclosure under this Act would, or would be likely to –*

*(a) endanger the physical or mental health of any individual, or*

*(b) endanger the safety of any individual.*

*(2) The duty to confirm or deny does not arise if, or to the extent that, compliance with section 1(1)(a) would, or would be likely to, have either of the effects mentioned in subsection (1).*

### **Public Interest Test**

#### **Public interest considerations in favour of releasing the information.**

There is a general public interest in openness and transparency in public sector bodies which can help to maintain public trust.

Information relating to Public Health Wales protective security measures in relation to its systems are clearly matters of public interest and we recognise that there is a legitimate interest in knowing that security measures are in place and where they are focused.

#### **Public interest considerations in favour of refusing to release the information.**

Public Health Wales has a duty to protect the public and individuals, and to provide a safe and effective public health service. The release of information under FOIA is 'release to the world' and I feel that releasing this information into the public domain would not be in the public interest.

Public Health Wales protective security measures that exist are there to protect our systems which are used to directly assist with the provision of patient care. It has been established that any groups who may be planning cyber-attacks are known to conduct extensive research into the opposition they might face and the release of any information which is held about the security of our systems, no matter how innocuous such requests may appear, may enhance the capability of cyber terrorists and hackers to carry out such attacks.

Releasing any information held could enable hackers and cyber criminals to gain knowledge about Public Health Wales capabilities and IT security measures, and this could enable them to plan attacks where they perceive a lower level of security resource exists. This exposes our IT systems to greater risk and therefore it also follows that risk to our systems will also constitute a risk to both public and staff of Public Health Wales as our systems are used to provide patient care

### **Balance of Public Interest Test**

Public Health Wales concedes that there is a very real interest in the public knowing that it has adequate levels of protection in place for its IT systems to ensure that we limit any potential for risk befalling the systems on which we heavily rely upon to complete our day to day business and for running the organisation.

However Public Health Wales believes that ensuring the safety of our systems is paramount and on the balance of the information provided above Public Health Wales believes that there would be a clear causative link between releasing the requested information which could then expose Public Health Wales to the risk of crime which could subsequently endanger or cause harm to our patients. Public Health Wales believes that confirming or denying the information requested is held could expose Public Health Wales sites to hackers and cyber criminals this in turn could lead to Public Health Wales being unable to deliver and provide patient care thereby resulting in a real risk of potential harm to our patients and staff and endanger individuals who are depend upon our IT systems for the care they require.

Public Health Wales therefore believes that the public interest in releasing this information outweighs any arguments for disclosure and so the information requested in question 4 is withheld. In accordance with Section 17 of the Freedom of Information Act 2000 this letter acts in part as a refusal notice for question 4.

Further guidance on Section 38 can be found here:-

<https://ico.org.uk/media/for-organisations/documents/1624339/health-and-safety-section-38-foia.pdf>

I am sorry that I cannot be of further assistance on this occasion.

If you are unhappy with the service you have received in relation to your request and wish to make a complaint or request a review of the decision, you should write to the

Corporate Complaints Manager, Public Health Wales NHS Trust, 3, Number 2, Capital Quarter, Tyndall Street, Cardiff, CF10 4BZ.

If you are not content with the outcome of your complaint or review, you may apply directly to the Information Commissioner for a decision. Generally, the ICO cannot make a decision unless you have exhausted the complaints procedure provided by the Trust. The Information Commissioner can be contacted at:

Information Commissioner for Wales

2nd Floor  
Churchill House  
Churchill Way  
Cardiff  
CF10 2HH

Telephone: 029 2067 8400

Email: [wales@ico.org.uk](mailto:wales@ico.org.uk)