



GIG
CYMRU
NHS
WALES

Bwrdd Iechyd
Addysgu Powys
Powys Teaching
Health Board

Information Governance Team
Monnow Ward
Bronllys Hospital
Bronllys
Brecon
Powys LD3 0LY
Email: Powys.FOI@wales.nhs.uk
Tel: 01686 252140/01874 442071

Our ref: IG/FOI/23.R.014

13 February 2023

Sent via email to: [REDACTED]

Dear [REDACTED],

Request under the Freedom of Information Act 2000

I write further to your request for information which was received on 16 January 2023 to confirm, in accordance with S.1(1)(a) of the Freedom of Information Act 2000, that Powys Teaching Health Board (PTHB) does hold the information that you require.

For ease of reference your request is set out below and our response follows:

Your Freedom of Information (FOI) Request:

1. What was the total number of cyber attack incidents that have been recorded in your trust in the past 24 months?
2. What is the classification of your policy regarding breach response?
3. Of the devices running Windows operating systems, what is the number and percentage of devices running Windows 11, Windows 10, Windows 7, Windows XP?
4. What are the top 20 cyber security risks in your Trust, and how are they managed?
5. Do you continue to use the Unified Cyber Risk Framework, if so how many risks are still identified/managed.
6. What is your Patch Management Cycle and how is it implemented on old Operating systems (e.g., for Windows , Windows XP)?
7. What is your current status on unpatched Operating Systems?
8. Of the devices running Windows Servers operating systems, what is the number and percentage of devices running Windows 2000, Windows 2003, Windows 2008, Windows 2012, Windows 2016, Windows 2019, Windows 2022?
9. Has your Trust signed up to and implemented the NHS Secure Boundary managed service to strengthen cyber resilience? If so, how many cyber

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Brecon, Powys LD3 0LU
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Rydym yn croesawu gohebiaeth Gymraeg
Bwrdd Iechyd Addysgu Powys yw enw gweithred Bwrdd Iechyd Lleol
Addysgu Powys



We welcome correspondence in Welsh
Powys Teaching Health Board is the operational name of
Powys Teaching Local Health Board

security threats has the NHS Secure Boundary detected within your NHS Trust since its implementation?

10. Does your Trust hold a cyber insurance policy? If so: a. What is the name of the provider; b. How much does the service cost; and c. By how much has the price of the service increased year-to-year over the last three years?
11. When did the current Board last receive a briefing on cybersecurity threats within healthcare, and when did they last participate in cyber security training? How frequently, if at all, do these briefings and trainings occur, and are they carried out by cyber security technology professionals?
12. Has your NHS Trust completed a Connection Agreement to use the Health and Social Care Network (HSCN)? If so, did you pass, and is there a copy of the code of connection?
13. Have there been any incidents of staff members or personnel within your Trust being let go due to issues surrounding cyber security governance?
14. How many open vacancies for cyber security positions are there within your Trust, and is their hour capacity affected by a shortage of qualified applicants?
15. Are there mandatory minimum training requirements for those transferred internally to work in cybersecurity within your Trust, and if so, how often is the training updated and revised to reflect the evolving nature of the industry?
16. How much money is spent by your Trust per year on public relations related to cyber attacks? What percentage of your overall budget does this amount to?
17. Does your Trust have a Chief Information Risk Officer? If so, who do they report to?
18. When was the last time your Trust underwent a security audit? At what frequency do these audits occur?
19. What is your strategy to ensure security in cloud computing?
20. Do you purchase additional / enhanced support from a Supplier for end-of-life software (Operating Systems / Applications)? If so, what are the associated costs per year per Operating System / Application, and the total spend for enhanced support?

Powys Response:

Q1-13, 15-16, 18 – 20 I confirm that PTHB holds the information you have requested. However, I am unable to provide the information as I consider that the following exemptions apply:

Section 31(1a) - The prevention or detection of crime:

"Information which is not exempt information by virtue of section 30 is exempt information if its disclosure under this Act would, or would be likely to, prejudice—

(a) the prevention or detection of crime"

Section 30 of the Freedom of Information Act 2000 does not apply to this request.

This information is exempt from disclosure under Section 31(1a) of the Freedom of Information Act 2000 (FoIA). We consider that if the data you have requested were to be combined with other information which may be available in the public domain, there would likely to be an increased risk of a cyber-security attack upon the Health Board. As part of the Critical National Infrastructure for the NHS, the Trust/Health Board has a duty to protect the integrity of our systems. The disclosure of the information requested could expose weaknesses in our systems and lead to breaches, making the UK or its citizens, in this case our patients, more vulnerable to security threat.

Section 43 Commercial Interests of the Freedom of Information Act. This section of the Act sets out an exemption from the right to know if releasing the information is likely to prejudice the commercial interests of any person (a person maybe an individual, company, the public authority itself or any other legal entity). Were our systems to be compromise, the cost of a system recovery would be detrimental to the Health Board's commercial interests.

Public Interest Test

To use these exceptions, we are required to undertake a public interest test. The matters which were considered in applying the public interest test are as follows:

Factors in favour of disclosure:

- Disclosure of the data supports the public interest in the transparency, accountability and general understanding of the delivery of public services.

Factors in favour of withholding:

- Breaches in Trust/Health board security and is therefore a reasonable threat to the confidential patient data held on our systems.
- Temporary or long-term lack of availability of IT systems
- Corruption/loss of patient data which would prevent or interrupt provision of patient care.
- Public interest in keeping PTHB's computer systems secure which would be served by non-disclosure.
- System recovery would be detrimental to PTHB's day to day business running

There is a strong public interest in protecting the confidentiality of patient data and of ensuring that health care services can be provided to the public without increasing the possibility of attack by hackers or malware, or of putting personal or other information held on these systems at risk of corruption or subject to illegal access. There is also an overwhelming public interest in keeping the Health Board's computer systems secure which would be served by non-disclosure. For these reasons PTHB has decided that it is in the public interest to withhold this information at this time. This response therefore acts as a refusal notice under section 17 of the FOIA.

Q14 Please see the Powys Teaching Health Board Website for further details on any vacancies at the current point in time, <https://pthb.nhs.wales/working-for-us/current-jobs/>

Q17 PTHB does not employ a Chief Information Risk Owner specific role but does have a Senior Information Risk Officer (SIRO) who is the Director of Finance, ICT and Information Services. He reports to the Chief Executive.

Should you need any further assistance, please do not hesitate to contact me at the address below.

If you are dissatisfied, with the way your request has been dealt with by PTHB, you have the right to request a review in which case you should write to:

Chief Executive
Powys Teaching Health Board Headquarters
Glasbury House
Bronllys Hospital
Bronllys
Brecon
Powys LD3 0LY

If you are still dissatisfied at the end of the review, you may complain to the Information Commissioner, who can be contacted at the following address:

Information Commissioner's Office - Wales
2nd Floor,
Churchill House,
Churchill Way,
Cardiff, CF10 2HH
Tel: 029 2067 8400 Fax 029 2067 8399
www.ico.org.uk twitter.com/iconews

Rydym yn croesawu derbyn gohebiaeth yng Nghymraeg. Byddwn yn ateb y fath ohebiaeth yng Nghymraeg ac ni fydd hyn yn arwain at oedi. We welcome receiving correspondence in Welsh. We will reply to such correspondence in Welsh and this will not lead to a delay.

Yours sincerely



Pete Hopgood
Director of Finance, IT & Information Services