



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.029

22 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 27 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:

Under the Freedom of Information Act 2000 may I kindly request the following information about your Cyber Insurance Spending The information needed is as follows:

SECURITY / CYBER SECURITY Insurance

Q1 Does your organisation currently have cyber insurance or plan to invest in cyber insurance in the next 12 months?

Q2 If you have cyber insurance who is the policy with?

Q3 If you have cyber insurance when does the policy come up for renewal?

Q4 If you have cyber insurance what is the cost of your current policy or renewal?

Powys Response:

I can confirm 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:

Pencadlys
Tŷ Glasbury, Ysbyty Bronllys,
Aberhonddu, Powys LD3 0LU
Ffôn: 01874 711661



Headquarters
Glasbury House, Bronllys Hospital
Brecon, Powys LD3 0LU
Tel: 01874 711661



"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. In this context, providing the requested information would provide information about the health boards response to cyber-attacks. There is a very strong public interest in preventing the information held by the health board from being subject to cyber-attacks. Providing the type of information requested would be likely to provide attackers with information relating to the state of our cyber security defences, and this is not in the public interest. 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.

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



Vicki Cooper
Assistant Director of Digital Transformation and Informatics

On behalf of Pete Hopgood
Director of Finance, IT & Information Services