



GIG
CYMRU
NHS
WALES

Bwrdd Iechyd Prifysgol
Cwm Taf Morgannwg
University Health Board



Freedom of Information Request: Our Reference CTMUHB_09_25

You asked:

I'm aware the Health Board has various contracts in place for Web Filtering and Security Awareness Training.

Can you please confirm the following:

1. What current web filter is in place and when this contract is due to expire?

In accordance with the Freedom of Information Act 2000, this acts as a Refusal Notice under section 17 of the Act.

Cwm Taf Morgannwg University Health Board has deemed that the web filter information requested is exempt from disclosure under Section 31(1)(a) of the Freedom of Information Act 2000 (the Act).

Section 31 – Law Enforcement of the Act states that:

31(1) 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

We consider that if the data you have requested were to be combined with other information that 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 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 our patients, more vulnerable to a security threat.

The University Health Board (UHB) recognises its duty to protect the public and individuals, and we will not jeopardise this duty by providing this information. In our opinion, this would pose a threat to our cyber security and, consequently, to the prevention or detection of crime as it would assist a third party to mount an attack on our IT systems by using the data provided to infer potential vulnerability.

Section 31(1)(a) of the Act provides that information which is not exempt by virtue of Section 30 (criminal investigations and proceedings) is exempt if its disclosure would, or would be likely to, prejudice the prevention or detection of crime. In guidance, the Information Commissioner's Office has advised that Section 31 amongst other things, prevents information being disclosed that would increase the risk of the law being broken. In addition, it can be claimed by any public authority.

Public Interest Test

In favour of disclosure - We recognise the need for transparency, and we appreciate that it is in the public interest to know that there are sufficient controls in place to prevent staff from accessing sites that may pose a risk to the organisation.

In favour of withholding - Providing these details could enable cyber criminals to gain knowledge about the Health Boards 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, constitutes a risk to both public and staff, as our systems are used to provide patient care.

Therefore, the UHB considers that the public interest in withholding the information outweighs any arguments for disclosure, therefore protecting the Health Board from potential criminal activity.

2. What current security awareness training is in place and when this contract is due to expire?

All training is developed in-house within NHS Wales. Security awareness training is part of our mandatory core skills learning. There is no contract in place.

3. Lastly, can you please confirm what reseller the trust used to purchase their web filter and security awareness training technologies?

Please see responses above.