



Ref: ATISN 26779

7 April 2026

Dear ,

**ATISN 26779 – Allergic Conditions**

Thank you for your request to Welsh Government for information under the Freedom of Information Act (2000) received on 06 March 2026 relating to allergy data and services across Wales.

You requested the following:

- 1. Does the Welsh Government collect or maintain national data on children (under 18) diagnosed with allergic conditions in Wales?*
- 2. Does the Welsh Government collect or maintain national data on waiting times for paediatric allergy services within NHS Wales?*
- 3. Does the Welsh Government hold information on the number of consultant paediatric allergists, specialist allergy nurses, or specialist allergy dietitians currently working within NHS Wales?*
- 4. Has the Welsh Government conducted any review, assessment, or analysis of access to paediatric allergy services in Wales since January 2020?*
- 5. Does the Welsh Government have any national strategy, policy, or guidance relating specifically to the provision of paediatric allergy services?*
- 6. Please provide copies of any reports, briefings, internal communications, or policy documents held by the Welsh Government relating to paediatric allergy services, workforce planning, or access to care for children with allergies in Wales.*

You also requested:

- 7. Does the Welsh Government collect or maintain national data on patients diagnosed with allergic conditions in Wales?*
- 8. Does the Welsh Government collect or maintain national data on waiting times for allergy services within NHS Wales?*
- 9. Does the Welsh Government hold information on the number of consultant allergists, specialist allergy nurses, or specialist allergy dietitians currently working within NHS Wales?*
- 10. Has the Welsh Government conducted any review, assessment, or analysis of access to allergy services in Wales since January 2020?*

11. *Does the Welsh Government have any national strategy, policy, or guidance relating specifically to the provision of allergy services?*
12. *Please provide copies of any reports, briefings, internal communications, or policy documents held by the Welsh Government relating to allergy services, workforce planning, or access to care for patients with allergies in Wales.*

## **Our Response**

The Welsh Government holds information for your request, however, we have concluded that some of the information requested is exempt from disclosure under the following sections of the Freedom of Information Act:

- Section 41 – Information provided in confidence. The reasons for applying these exemptions are set out in full at Annex 1
- Section 40(2) – Personal Information. An explanation of our application of this exemption is set out at Annex 2

1. *No. The Welsh Government does not hold a centrally collated national dataset identifying children diagnosed with allergic conditions in Wales. Diagnostic information is recorded within NHS patient records. While the Admitted Patient Care (“APC”) dataset held by Digital Health and Care Wales (“DHCW”) may include diagnostic coding for hospital admissions, this does not provide a comprehensive picture of diagnosis across Wales. The requester may wish to contact DHCW or individual organisations for further information.*
2. *No. The Welsh Government does not collect comprehensive national data on waiting times specifically for paediatric allergy services within NHS Wales. The requester may wish to contact individual NHS health boards for further information.*
3. *No. The Welsh Government does not hold centrally collated information on the number of staff working in these specialist paediatric allergy roles. Workforce information is held locally by NHS health boards, whom the requestor may wish to contact for further information.*
4. *The Welsh Government has not undertaken a formal national review or assessment. An internal scoping exercise was commissioned to support policy development and to improve understanding of paediatric and adult allergy provision across Wales. This did not constitute a formal review.*
5. *No. The Welsh Government does not have a standalone national strategy or policy relating specifically to paediatric allergy services. Service planning and delivery are the responsibility of local health boards, in line with relevant National Institute for Health and Care Excellence (“NICE”) guidelines.*
6. *The Welsh Government holds information within scope. The following documents have been identified.*

## **Documents to be released**

- *December 2023 letter to health board Directors of Strategy, Planning and Partnerships regarding allergy service provision following Cardiff and Vale University Health Board's ("CVUHB") change to referral arrangements.*
- *Six health board responses to the December 2023 letter – including Powys Teaching Health Board ("PTHB"), Swansea Bay University Health Board ("SBUHB"), CVUHB, Hywel Dda University Health Board ("HDUHB"), Betsi Cadwaladr University Health Board ("BCUHB") and Cwm Taf Morgannwg University Health Board ("CTMUHB").*
- *February 2025 letters to health board Directors of Strategy, Planning and Partnerships regarding the internal allergy scoping exercise and identification of commissioning and clinical contacts (adult and paediatric).*
- *Five health board responses to the February 2025 letters including CVUHB, CTMUHB, HDUHB, SBUHB, and ABUHB.*
- *Letters dated 18-19 February 2025 to health board clinical and commissioning representatives regarding participation in the adult and paediatric allergy scoping exercise.*
- *Note of meeting dated 29 July 2025 with health board allergy commissioning representatives.*
- *September 2025 letters to health board Medical Directors, Directors of Strategy, Planning and Partnerships, and Executive Directors of Nursing updating on completion of the internal scoping exercise.*
- *Four health board responses to the September 2025 letter, including CTMUHB, SBUHB, ABUHB and CVUHB.*
- *September 2025 email updates to Welsh Government internal primary care and planning colleagues.*
- *Paper 1 – Summary Paper: Availability of Local Allergy Services within Welsh Health Boards.*

## **Information withheld**

*Health board survey returns and the final scoping report are withheld under section 41 (see Annex 1) as they contain information provided in confidence by NHS organisations.*

7. *No. The Welsh Government does not hold a centrally collated national dataset identifying patients diagnosed with allergic conditions in Wales. Diagnostic information is held locally within NHS clinical systems. The requester may wish to contact individual NHS health boards for further information.*
8. *No. The Welsh Government does not collect comprehensive national data on waiting times specifically for allergy services within NHS Wales. The requester may wish to contact individual NHS health boards for further information.*

9. *No. The Welsh Government does not hold centrally collated information on staff working in these specialist allergy roles. Workforce data is held locally by NHS health boards, whom the requestor may wish to contact for further information.*
10. *No formal national review or assessment has been undertaken. As noted in our response to question 4, an internal scoping exercise was commissioned to inform policy development and understanding of allergy services across Wales.*
11. *No. The Welsh Government does not have a standalone national strategy or policy specific to allergy services. Service planning and delivery are the responsibility of local health boards, in line with relevant NICE guidelines.*
12. *The information held and the documents identified are the same as those set out in response to question 6. Information provided by NHS organisations in confidence, including survey returns and the final scoping report, is withheld under section 41 (see Annex 1).*

## **Next Steps**

If you are dissatisfied with the Welsh Government's handling of your request, you can ask for an internal review within 40 working days of the date of this response. Requests for an internal review should be addressed to the Welsh Government's Freedom of Information Officer at:

Information Rights Unit  
Welsh Government  
Cathays Park  
Cardiff  
CF10 3NQ  
or Email: [Freedom.ofinformation@gov.wales](mailto:Freedom.ofinformation@gov.wales)

Please remember to quote the ATISN reference number above.

You also have the right to complain to the Information Commissioner. The Information Commissioner can be contacted at:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

However, please note that the Commissioner will not normally investigate a complaint until it has been through our own internal review process.

Yours sincerely,



## Annex 1

### **Section 41: Information provided in confidence**

Section 41 of the Freedom of Information Act 2000 provides an exemption from the right to know where the information requested was provided to the public authority in confidence and disclosure of the information would give rise to an actionable breach of confidence.

Section 41(1) states that information is exempt if:

- (a) it was obtained by the public authority from any other person (including another public authority), and*
- (b) the disclosure of the information to the public (otherwise than under this Act) by the public authority holding it would constitute a breach of confidence actionable by that or any other person.*

Section 41 is an absolute exemption and is not, therefore, subject to the public interest test.

The information withheld under section 41 consists of detailed information provided by NHS health boards and their representatives as part of an internal scoping exercise on allergy services in Wales. This includes completed survey returns, supporting material and analysis forming part of the final scoping report.

For the purposes of S41(1)(a), I can confirm that the information has been provided to Welsh Government by third parties, namely NHS health boards and individual clinical and commissioning representatives acting on behalf of those organisations.

The information meets the established common law test for confidentiality (as set out in the three-stage test taken from the case of *Coco v Clarke*), for the following reasons:

- **The information has the necessary quality of confidence:**

The information is detailed, specific to individual health boards, and not otherwise publicly available. It includes service configuration, workforce information and contextual commentary that is not trivial or in the public domain.

- **the information was imparted in circumstances importing an obligation of confidence**

Health boards were asked to participate in the scoping exercise on the clear understanding that information would be shared within the Welsh Government in confidence, for internal policy development purposes only. Engagement took place through direct correspondence, surveys and one-to-one discussions, and participants were not informed that their responses would be published or disclosed more widely.

- **there was an unauthorised use of the information to the detriment of the confider (the element of detriment is not always necessary):**

Disclosure would constitute unauthorised use of the information beyond the purpose for which it was provided. This would be likely to undermine the trust and confidence of NHS health boards and their representatives and could reasonably be expected to deter open and candid engagement in similar exercises in future.

In light of the above, as disclosure would therefore give rise to an actionable breach of confidence, the information has been withheld under Section 41 of the Freedom of Information Act 2000.

## Annex 2

### **Freedom of Information Act 2000: Section 40(2) Personal information about others**

Section 40(2) together with the conditions in section 40(3)(a)(i) or 40(3)(b) provides an absolute exemption if disclosure of the personal data would breach any of the data protection principles.

'Personal data' is defined in sections 3(2) and (3) of the Data Protection Act 1998 ('the DPA 2018') and means any information relating to an identified or identifiable living individual. An identifiable living individual is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of the individual.

We have concluded that, in this instance, the information caught by your request contains third party personal data.

Under Section 40(2) of the FOIA, personal data is exempt from release if disclosure would breach one of the data protection principles set out in Article 5 of the GDPR. We consider the principle being most relevant in this instance as being the first. This states that personal data must be:

*"processed lawfully, fairly and in a transparent manner in relation to the data subject"*

The lawful basis that is most relevant in relation to a request for information under the FOIA is Article 6(1)(f). This states:

*"processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child"*.

In considering the application of Article 6(1)(f) in the context of a request for information under FOIA it is necessary to consider the following three-part test:

- **The Legitimate interest test:** Whether a legitimate interest is being pursued in the request for information.
- **The Necessity test:** Whether disclosure of the information/confirmation or denial that it is held is necessary to meet the legitimate interest in question.
- **The Balancing test:** Whether the above interests override the interests, fundamental rights and freedoms of the data subject.

Our consideration of these tests is set out below:

#### **1. Legitimate interests**

Your request includes some documents which were caught by your request. I have not identified any legitimate interest that you may have in knowing the identities of those individuals named within the emails.

#### **2. Is disclosure necessary?**

We do not believe disclosure of the identities of those involved would allow any greater understanding of the content of the emails.

### **3. The balance between legitimate interests and the data subject's interests or fundamental rights and freedoms**

As we do not believe disclosure of this personal data is necessary, there is no requirement on us to undertake a test to balance the legitimate interests against the right of individuals, as the fundamental rights and freedoms provided by the DPA are not being challenged.

I have concluded that there is a reasonable expectation that the identity of the living individuals named in the correspondence would not be made public. It is my view, therefore, that disclosure of the redacted information would breach the first data protection principle, and thus is exempt from release under section 40 of the FOI Act.