

23/12/2025

NN-ICB/25-1420

Dear Requestor

Re: Freedom of Information Request

Thank you for your request for information, received on 2 December 2025, regarding external suppliers and partner organisations that fall within the remit of the NHS Data Security and Protection Toolkit (DSPT). The request has been considered in accordance with the Freedom of Information Act 2000 (FOIA). Under the FOIA, public authorities are required to respond to requests for information within 20 working days.

NHS Nottingham and Nottinghamshire Integrated Care Board (ICB) can confirm that it holds information relevant to your request. This includes information relating to current DSPT-relevant suppliers, assurance arrangements, and records relating to onboarding or planned suppliers.

However, for the reasons set out below, the ICB is unable to disclose the information requested in full.

Please find below our response to your request:

Under the Freedom of Information Act 2000, please provide the following information:

1. A list of all external suppliers, contractors, or partner organisations who currently fall within the remit of the NHS Data Security & Protection Toolkit (DSPT) for your organisation.
2. For each supplier identified, please confirm (if recorded):
 - Whether they are required to maintain a “Standards Met” DSPT submission
 - The date you last checked or verified their DSPT status (or expected verification date for new suppliers)
3. Does your organisation maintain an internal register or log of DSPT-relevant suppliers (including planned or onboarding suppliers)?
 - If yes, please provide the relevant extract.
 - If no, please confirm that no such register exists.

Exemption applied: Section 31(1)(a) – Law enforcement (prevention or detection of crime)

The ICB considers that the information requested is exempt from disclosure under Section 31(1)(a) of the FOIA, which provides an exemption where disclosure would, or would be likely to, prejudice the prevention or detection of crime.

As an NHS Integrated Care Board, the ICB commissions services and oversees a complex supply chain which includes national system suppliers, digital health platforms, communications providers, commissioning support organisations, NHS bodies, voluntary sector organisations and small to medium enterprises. Many of these suppliers have access to, or process, sensitive personal and confidential information, or provide services that are integral to the secure operation of NHS systems.

Disclosure of detailed information identifying individual suppliers, their DSPT assurance status, verification dates, or the structure and content of internal DSPT assurance registers would be likely to:

- reveal information about the ICB’s information governance and cyber assurance arrangements;
- indicate levels of security maturity or assurance cadence across the supply chain; and
- expose dependencies or assurance gaps that could be exploited.

Such disclosure would be likely to assist malicious actors in identifying potential vulnerabilities within the ICB’s supply chain and targeting specific organisations or systems, thereby increasing the risk of cyber-attack. Cyber-crime is a recognised Tier 1 threat to the UK and may constitute criminal offences under legislation such as the Computer Misuse Act 1990.

Any disclosure made under the FOIA is considered to be disclosure to the public at large. There is a real risk that the requested information could be misused either on its own or when combined with other publicly available information (the “mosaic effect”), which would prejudice the ICB’s ability to prevent or detect crime.

Consideration of partial disclosure

The ICB has considered whether it would be possible to disclose the information in a redacted, anonymised, or aggregated form. However, even high-level disclosure (for example, anonymised supplier lists, categories of suppliers, or summary assurance information) would risk revealing patterns in the ICB’s security controls and supplier landscape. For this reason, the ICB considers that partial disclosure would not sufficiently mitigate the risk of prejudice.

Public interest test

Section 31 is a qualified exemption and is subject to the public interest test.

Factors in favour of disclosure	Factors in favour of maintaining the exemption
<p>Promoting transparency and accountability in relation to how the ICB assures itself that suppliers meet data protection and information security standards.</p>	<p>There is a strong public interest in protecting NHS organisations from cyber-crime and safeguarding sensitive patient and corporate information.</p> <p>Disclosure would undermine the ICB’s ability to manage information security risks across a complex and diverse supply chain.</p> <p>Preventing crime and protecting NHS systems and data carries significant weight in the public interest.</p>

On balance, the ICB considers that the public interest in maintaining the exemption outweighs the public interest in disclosure.

4. A list of any new, incoming, or planned suppliers (contracted or due to go live within the next 12 months) who will fall within the DSPT remit for the same reasons.

Exemption applied: Section 43(2) – Commercial interests

The ICB considers that this information is exempt from disclosure under Section 43(2) of the FOIA, which applies where disclosure would, or would be likely to, prejudice the commercial interests of any person, including the public authority.

Information relating to planned or incoming suppliers would reveal details of the ICB’s commissioning intentions, procurement activity, supplier engagement, and pipeline of future contracts. Disclosure of this information would be likely to:

- prejudice the commercial interests of third-party suppliers by exposing commercially sensitive information;
- undermine fair and effective competition; and
- prejudice the ICB’s ability to negotiate and secure best value for public funds.

Public interest test

Section 43 is a qualified exemption and is subject to the public interest test.

Factors in favour of disclosure	Factors in favour of maintaining the exemption
Supporting transparency in public procurement and accountability for the use of public money.	Protecting the legitimate commercial interests of suppliers engaging with the NHS. Avoiding harm to live or future procurement processes. Ensuring the ICB can maintain a competitive market and achieve value for money.

On balance, the ICB considers that the public interest in maintaining the exemption outweighs the public interest in disclosure.

Advice and assistance

In accordance with Section 16 of the FOIA, the ICB would be happy to consider whether alternative, higher-level information relating to its overall approach to DSPT assurance and supplier information governance could be provided, should this be of assistance.

In addition, while the ICB is unable to disclose supplier-specific DSPT information under the FOIA, it may be helpful to note that some organisations choose to make their Data Security and Protection Toolkit assertions publicly available via the NHS DSP Toolkit platform, which is managed by NHS England.

It is important to note that any information published on that platform is determined by the individual organisation and does not represent confirmation, endorsement, or assurance activity by the ICB.

If you are unhappy with the way in which your request has been handled, NHS Nottingham and Nottinghamshire Integrated Care Board (ICB) has an internal review procedure through which you can raise any concerns you might have. Further details of this procedure can be obtained by contacting Lucy Branson, Director of Corporate Affairs via lucy.branson@nhs.net or by writing to FOI Team at NHS Nottingham and Nottinghamshire ICB, Sir John Robinson House, Sir John Robinson Way, Arnold, Daybrook, Nottingham NG5 6DA.

If you remain dissatisfied with the outcome of the internal review, you can apply to the Information Commissioner's Office (ICO), who will consider whether the organisation has complied with its obligations under the Act and can require the organisation to remedy any problems. Generally, the ICO cannot make a decision unless you have exhausted the complaints procedure provided by NHS Nottingham and Nottinghamshire ICB. You can find out more about how to do this, and about the Act in general, on the Information Commissioner's Office website at: <https://ico.org.uk/for-the-public/>.

Complaints to the Information Commissioner's Office should be sent to:

FOI/EIR Complaints Resolution, Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. Telephone 0303 123 1113 or report a concern via <https://ico.org.uk/concerns/>.

Yours sincerely

Freedom of Information (FOI) Officer on behalf of NHS Nottingham and Nottinghamshire Integrated Care Board

nnicb-nn.foi@nhs.net

All information we have provided is subject to the provisions of the Re-use of Public Sector Information Regulations 2015. Accordingly, if the information has been made available for re-use under the [Open Government Licence](#) (OGL) a request to re-use is not required, but the license conditions must be met. You must not re-use any previously unreleased information without having the consent of NHS Nottingham and Nottinghamshire Integrated Care Board. Should you wish to re-use previously unreleased information then you must make your request in writing (email will suffice) to the FOI Lead via nnicb-nn.foi@nhs.net. All requests for re-use will be responded to within 20 working days of receipt.