NHS
Nottingham and Nottinghamshire
Integrated Care Board

17/07/2026

NN-ICB/26-1673

Dear Requestor

Re: Freedom of Information Request

Thank you for your request for information, received on 24 June 20026, regarding telephony. We have processed your request in accordance with the Freedom of Information Act 2000 (FOIA).

Under the FOIA, public authorities like ours are required to respond to requests for information within 20 working days. In response to your request, I can confirm that we do hold the information requested. However, please note that some of the information you requested has been withheld. Under the FOIA, certain exemptions may apply to protect sensitive information.

Please find below our response to your request:

SECTION 1 — TELEPHONY INFRASTRUCTURE

1.1 What telephony system(s) does NHS Nottingham and Nottinghamshire ICB currently use for inbound and outbound calls? Mitel.

Please provide:

a) Vendor / manufacturer name. Mitel.

b) Product / platform name (e.g. Cisco Unified Communications Manager, Avaya Aura, Mitel MiVoice, Microsoft Teams Direct Routing, 8x8, RingCentral, Gamma, BT Cloud Voice). Mitel MiVoice.

c) Version or generation currently in use.

This information is confidential due to cyber security sensitivities and is therefore exempt under Section 31(1)(a) of the Freedom of Information Act 2000 for the following reasons:

Our organisation may be subject to cyber-attacks and, since it holds sensitive, personal and confidential information, maintaining the security of this information is extremely important. Cyber-attacks, which may amount to criminal offences for example under the Computer Misuse Act 1990 or the Data Protection Act 1998, are rated as a Tier 1 threat by the UK Government.

Section 31(1)(a) says that a public authority does not have to disclose information under section 1 Freedom of Information Act 2000, where doing so would or would be likely to prejudice the functions of law enforcement, in this case, the prevention or detection of crime.

In this context, providing the requested information would provide information about information security systems and its resilience to cyber-attacks. There is a very strong public interest in preventing our information systems 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.

Prejudice Test

In engaging this exemption, it is necessary to consider the prejudice test as followed by the Information Commissioner's Office.

Applicable interests

In this case the request relates to details about the specific telephony system version information the ICB has in its IT estate.

The ICB considers that the release of this information would or would be likely to put the ICB at risk of being targeted by cyber criminals as it would reveal the specific IT systems/software used and would or would be likely to allow cyber criminals to target the specific system vulnerabilities to gain unlawful access to information. This could compromise sensitive information held by the ICB and make it more vulnerable to crime.

Any disclosure made under the Freedom of Information Act, is deemed to be made to the public at large. There is a risk that this information could be used for criminal activity either on its own or together with other information in a mosaic effect which increases the risk of prejudice to the prevention of crime.

The nature of the prejudice

The prejudice that may result must be "real, actual or of substance" and there must be a causal link between the disclosure and the potential prejudice. The prejudice in this case is the ICB's ability to prevent unlawful access, theft, vandalism to its systems and safeguard the data held in those systems.

As a public authority the ICB is a potential target for cyber criminals. Disclosing information about the specific systems, software or hardware used would or would be likely to provide cyber criminals with information needed to gain unlawful access to information held by the ICB, such as personal data held about patients as well as employees. Furthermore, the ICB also holds commercially sensitive information that, on balance, would or would be likely to cause prejudice to the ICB financially, contractually and reputationally if unlawfully accessed. The real and actual prejudice described would or would be likely to cause a detrimental effect to patients as well as to the business interests and reputation of the ICB.

The causal link between the disclosure under the Freedom of Information request to the prejudice that would or would likely be caused has been demonstrated above. To confirm, placing such information into the public domain weakens the security of the ICB's systems and, therefore, its ability to sufficiently protect the data it holds.

The likelihood of prejudice

The ICB has demonstrated that there is a real and significant risk that the prejudice in relation to the unlawful access to systems would or would be likely to occur.

In undertaking the prejudice test, the ICB considers that the above prejudice and subsequent harm/damage would or would be likely to occur if the information were disclosed.

The Information Commissioners Office Prejudice Test guidance - The prejudice test | ICO - states the following.

'Would' therefore means 'more probable than not'; in other words, there is a more than 50% chance of the disclosure causing the prejudice, even though it is not absolutely certain that it would do so.

'Would be likely' means that there must be more than a hypothetical or remote possibility of prejudice occurring; there must be a real and significant risk of prejudice, even though the probability of prejudice occurring is less than 50%.

In taking all of the above into account, the ICB concludes that the likelihood of prejudice would cause harm if the information was disclosed.

Public Interest Test

The Information Commissioners Office states:

Section 31 is a prejudice based exemption and is subject to the public interest test. This means that not only does the information have to prejudice one of the purposes listed, but, before the information can be withheld, the public interest in preventing that prejudice must outweigh the public interest in disclosure.

A public interest test was undertaken on the 19 July in response to your request made under the Freedom of Information Act 2000.

Factors favouring disclosure

The ICB recognises that disclosure of the information sought in relation to networking equipment would promote accountability and transparency about how the organisation and the NHS in general perform our functions.

Factors favouring non-disclosure

Conversely to the factors demonstrated above in favour of disclosing the information sought in relation to networking equipment, there is an inherent public interest in protecting the ability of public authorities to enforce the law and therefore protect society from crime. There is public interest in complying with the ICB's legal obligations to keep personal data secure and to take appropriate measures which includes keeping areas confidential where necessary.

On balance of the factors considered above, along with relevant case law, we conclude that the ICB would be entitled to withhold information relating to the version or generation of networking equipment and that this would not be superseded by public interest considerations.

1.2 Is your telephony system:

a) On-premise (hosted within your own data centre or server rooms). Yes.

b) Cloud-based / hosted (vendor or third-party managed). No.

c) Hybrid (combination of on-premise and cloud). No.

1.3 Approximately how many telephone lines and/or DDI (Direct Dial-In) numbers does NHS Nottingham and Nottinghamshire ICB currently operate?

20,000, this includes both ICB and GP practice lines.

1.4 When was your current telephony system first installed or last substantially upgraded?

The ICB does not hold this information. The telephony system is managed by Nottinghamshire Health Informatics Service (NHIS) on behalf of the ICB and information regarding installation dates and system upgrades is not held by the ICB.

SECTION 2 — CONTACT CENTRE / PATIENT ACCESS

2.1 Does NHS Nottingham and Nottinghamshire ICB operate a dedicated contact centre, patient access centre, or centralised switchboard function? No.

If yes, please provide:

a) Name or primary function of the contact centre / access centre. Not applicable.

b) Communication channels currently supported (e.g. voice/telephone, email, webchat, SMS, social media, video). Not applicable.

c) Contact centre platform or software used to manage queuing, routing, and agent interactions (e.g. Cisco UCCE / UCCX, Avaya Contact Centre, Genesys Cloud, NICE CXone / inContact, Amazon Connect, Salesforce Service Cloud, Freshdesk, Puzzel, Content Guru). Not applicable.

2.2 How many contact centre agent seats or licences does NHS Nottingham and Nottinghamshire ICB currently hold? Zero.

2.3 What is the approximate annual inbound call volume handled by your contact centre or switchboard? Not applicable.

2.4 Does your organisation use an Interactive Voice Response (IVR) or automated call routing system? No.

If yes, please provide the vendor and product name. Not applicable.

SECTION 3 — SUPPORT AND MAINTENANCE CONTRACTS

3.1 Who provides support and maintenance for your telephony and/or contact centre system(s)? Nottinghamshire Health Informatics Service.

Please provide (for each system if more than one):

a) Name of the support provider (vendor direct support or third-party maintenance organisation) Nottinghamshire Health Informatics Service.

b) Type of coverage (vendor support, third-party maintenance, or both). Both.

c) Approximate annual value of the support / maintenance contract. The ICB does not hold a separate contract for telephony support and maintenance. Telephony services form part of a wider managed service arrangement provided by Nottinghamshire Health Informatics Service (NHIS), and the cost of support and maintenance is not separately identified.

d) Contract start date and expiry / renewal date. The ICB does not hold a telephony-specific support and maintenance contract. Telephony services are provided under the wider annual core services contract with Nottinghamshire Health Informatics Service (NHIS), which is due for renewal on 1 April 2027.

3.2 Are any significant telephony or contact centre contracts (including licences, maintenance, or managed service agreements) due for renewal within the next 24 months? If yes, please provide the contract category and approximate renewal date (full commercial detail is not required). No.

3.3 What procurement framework(s) did NHS Nottingham and Nottinghamshire ICB use to procure its current telephony or contact centre solution(s)? (e.g. Crown Commercial Service (CCS) RM6116, NHS Shared Business Services, G-Cloud, Tech Products 4, direct award, competitive tender).

The ICB does not hold this information. NHS Nottingham and Nottinghamshire ICB has not directly procured a telephony or contact centre solution. These services were procured and are managed by Nottinghamshire Health Informatics Service (NHIS) as the ICB's technology service provider. Consequently, the ICB does not hold information regarding the procurement framework, procurement route, or contractual arrangements used in relation to the telephony solution.

SECTION 4 — STAFFING

4.1 How many whole-time equivalent (WTE) staff are directly employed by NHS Nottingham and Nottinghamshire ICB in contact centre, patient access centre, or switchboard roles? Zero.

4.2 Please provide a breakdown of contact centre / switchboard staff by job role or Agenda for Change (AfC) band (or equivalent). Specific names of individuals are not required; job title or band is sufficient. Not applicable (see response to 4.1).

4.3 Does NHS Nottingham and Nottinghamshire ICB use any outsourced or third-party contact centre agents or managed service operators? No.
If yes, please provide:

a) Approximate number of outsourced agent seats or FTEs. Not applicable.

b) Name of the outsourced provider. Not applicable.

c) Approximate annual cost of the outsourced arrangement. Not applicable.

4.4 Does NHS Nottingham and Nottinghamshire ICB have a named senior role responsible for contact centre or patient access operations? (e.g. Head of Contact Centre, Head of Patient Access, Director of Operations — name of individual not required, role title only). No.

SECTION 5 — FUTURE PLANS

5.1 Is NHS Nottingham and Nottinghamshire ICB currently planning, evaluating, or actively procuring a replacement or substantial upgrade to its telephony or contact centre system within the next 24 months? If yes, please state the anticipated timeline and scope (e.g. full platform replacement, cloud migration, additional channel capability). No.

5.2 Has NHS Nottingham and Nottinghamshire ICB completed or commissioned any review, business case, or digital roadmap covering telephony or contact centre transformation in the last two years? No.

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 Governance and Assurance 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.