Belfast Health and Social Care Trust
caring supporting improving together

FOI/33599

11 September 2025

Policy Compliance

In accordance with the Freedom of Information Act, please could you answer the following questions -

1. Who holds health board wide responsibility for the maintenance of procedures and policies?

Ownership/Authorship of policies and local procedures is the responsibility of the Directorates/Divisions who develop or adopt the guidance. The administrative oversight and support of internal guidance is part of the function of the Policy & External Guidance (PEG) Assurance Committee whose purpose is the review and approval of all clinical/non-clinical Trustwide and specialist and directorate specific policies, Interventional Procedures and Care Pathways.

2. What is their name and email address?

The membership of PEG includes nominated representatives from all Directorates, policy/protocol authors will also attend to present new and review policies, interventional procedures and care pathways. There is a generic email address used for internal guidance communications: internalguidance@belfasttrust.hscni.net

3. What digital tools does the health board use for the staff to reference these procedures and policies?

This information is withheld on the basis of cybersecurity on the basis it relates to core digital infrastructure.

4. How does the health board record that staff have read and comply with the procedures and policies?

Not responsibility of PEG – all areas will have their own local practice for recording and this will depend on the type of guidance and the nature of the service

5. Which tools are used for on-boarding new staff in relation to reading procedures and policies?

Not responsibility of PEG – all areas will have their own local practice for onboarding and this will depend on the type of guidance and the nature of the service

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7. How do the heads of department monitor that clinical and non-clinical staff have read/understood mandatory procedural updates?

Not responsibility of PEG – all areas will have their own local practice for monitoring and this will depend on the type of guidance and the nature of the service

8. How many staff have accessed your NHS Intranet in the past year?

The intranet is accessible by all staff across the Trust. Specific activity data is withheld on the basis of cyber security threat.

Exemptions applied:

Section 31 – Law Enforcement

Section 31(1)(a) states that information is exempt if its disclosure is likely to prejudice the prevention or detection of crime. ICO guidance states that this can be used to protect information on a public authority's systems which would make it more vulnerable to crime. It can be used by a public authority that has no law enforcement function:

- To protect the work of one that does
- To withhold information that would make anyone, including the public authority itself, more vulnerable to crime

Section 38 – Health & Safety

Section 38 states that information is exempt if its disclosure could lead to the physical or mental harm of, or endanger the safety of, individuals.

Disclosure of the requested information would leave the Belfast Trusts digital infrastructure at significant risk of cyber security attack. A cyber-security attack may lead to the placing of sensitive health & social care information into the public domain and, as such, the Trust believes there is a link between the risk of endangerment for data subjects and the disclosure of the requested information. There would likely be a substantial detrimental effect on the physical or mental health of patients, clients, staff or their families should the requested information be released.

Section 43 – Commercial Interests

Section 43(2) states that information is exempt if its disclosure would, or would be likely to, prejudice the commercial interests of any person (including the public authority holding it).

Disclosure of the requested information would leave the Belfast Trusts digital infrastructure at significant risk of cyber security attack. This would compromise the Belfast Trusts ability to provide Health & Social Care Services and carry on business-as usual should the digital systems be compromised.

Outcome

There is an overwhelming public interest in keeping Health & Social Care digital systems and critical national infrastructure secure which would be served by non-disclosure. This outweighs the public interest in accountability and transparency which would be served by disclosure.