

25 March 2026

## **Governance and Risk Management where Estates Employees hold External Professional or Representative Roles alongside Substantive Trust Employment**

**This is a request under the Freedom of Information Act 2000. We are requesting information in relation to Belfast Health and Social Care Trust (BHSCT).**

### **Background**

**We are seeking to understand the Trust's arrangements, governance, and risk management where Estates employees hold external professional or representative roles and/or additional internal specialist roles alongside their substantive employment with the Trust, and how these arrangements are managed to ensure there is no adverse impact on service delivery, management of the estate, organisational resilience, or minor and major capital project delivery.**

The HSC Code of Conduct (see Attachment) sets out the standards of integrity, behaviour and openness expected of all Health and Social Care employees.

### **Scope of request**

**This request relates to the following roles:**

- A BHSCT employee who holds (or has held) the role of President of the Institute of Healthcare Engineering and Estates Management (IHEEM); and**
- A BHSCT employee who holds the role of Responsible Engineer (Water), including:**
  - Involvement in the UK New Hospital Programme;**
  - Appointment as a speaker or contributor for the Healthcare Infection Society (HIS) and/or other external organisations; and**
  - Holding key internal roles within the Trust's Water Safety Groups, Water Usage Groups, or equivalent governance forums.**

With regard to individual roles within the Estates Service, Belfast Health and Social Care Trust are unable to provide much of the information requested, as this request relates to <5 individuals.

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Use of <5 (less than five): We are unable to provide information where staff numbers are very low, i.e. <5, as this information would reduce numbers to discoverable limits, where the individuals could be identifiable.

The information is exempt from release under Section 40(2) of the Freedom of Information Act - Personal Information relating to a third party.

Disclosure would constitute a breach of the principles of the General Data Protection Regulation 2018.

Belfast Trust will only be able to provide generic responses to some of the questions below.

**For each of the above roles, please provide the information requested below for the period 1 January 2023 to 31 December 2025, where applicable.**

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## Information requested

### 1. Time allocation

**For each role, please confirm whether duties were undertaken:**

- **During contracted BHSCCT working hours;**
- **Using annual leave;**
- **Using unpaid leave; or**
- **Under another formal arrangement (for example, professional leave, special leave, secondment, or agreed flexible working).**

Information not recorded.

### 2. Pay and remuneration

**Please confirm:**

- **Whether the employee continued to receive their substantive BHSCCT salary while undertaking duties associated with the external and/or additional specialist roles; and**
- **Whether any additional payment, honorarium, or reimbursement of expenses was provided in connection with these roles by:**
  - **Belfast Health and Social Care Trust; and/or**
  - **Any external organisation (including IHEEM, the Healthcare Infection Society, or others).**

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In response to Question 2 (Parts 1 and 2), this information is exempt from release under Section 40(2) of the Freedom of Information Act - Personal Information relating to a third party.

Disclosure would constitute a breach of the principles of the General Data Protection Regulation 2018.

### **3. Approvals and governance**

**Please provide:**

- **Whether formal approval was required and granted by BHSCT for the employee to undertake the external and/or additional specialist roles; and**
- **The relevant BHSCT or HSC policies, frameworks, or governance documents governing**
  - **External appointments;**
  - **Outside professional activities;**
  - **Internal specialist or advisory roles (including Water Safety or Water Usage Groups); and**
  - **Declarations of interest.**

All employees are expected to act in accordance with the HSC Code of Conduct (see Attachment)

There is no Declaration of Interests or Register of Interests policy.

### **4. Declarations and conflicts of interest**

**Please confirm:**

- **Whether the external roles and any relevant internal specialist roles were recorded within the Trust's Register of Interests;**

Yes

- **Whether any conflict-of-interest mitigations or management actions were implemented as a result of holding these roles concurrently.**

Information not held.

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**5. Organisational capacity, resilience, and programme delivery**  
In the context of the Trust's responsibility to manage a safe estate, please provide:

- **Whether any assessment was undertaken to consider the impact on organisational capacity, resilience, or continuity of service arising from employees holding multiple external and/or internal specialist roles;**

Information not held.

- **Whether any mitigating arrangements were implemented, such as:**
  - **Backfill arrangements;**
  - **Redistribution of duties;**
  - **Temporary cover; or**
  - **Revised governance or reporting arrangements; and**

Information not held.

- **Details of any documented risk assessments, business cases, risk register entries, or governance papers that considered the effect of these role commitments on the Trust's ability to deliver its operational or capital programmes (or, where disclosure is not possible, the titles and dates of such documents).**

Information not held

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**Clarifications**

- **We are not requesting personal data, including staff names or any information that would identify an individual.**
- **Information may be provided in an anonymised, aggregated, or role-based format where necessary to comply with section 40 of the Freedom of Information Act and UK GDPR.**
- **If any part of this request is refused, please specify the exemption relied upon and provide any information that can reasonably be disclosed.**

As stated at the outset, the scope of this request has the potential to identify individual employees, hence our generic reply.

The information not disclosed concerning individuals, is exempt from release under Section 40(2) of the Freedom of Information Act - Personal Information relating to a third party. Disclosure would constitute a breach of the principles of the General Data Protection Regulation 2018.