

01 June 2026

Inappropriate Access to Trust-Held Records

To request recorded information relating to Belfast Trust-wide communication issued in April 2026 concerning inappropriate access to Trust-held records.

1. The number of recorded incidents of inappropriate, unauthorised or otherwise improper access to patient, service user or staff records within the Belfast Trust from 1 January 2023 to date, broken down by year and, where recorded, by system involved (including Encompass, NIECR and other electronic systems), or otherwise in the closest available recorded format.

There have been 26 incidents involving staff accessing patient medical records without appropriate authorisation or legitimate clinical reason which have been reported to the Information Governance (IG) Department from 1 January 2023 to date.

The table below provides a breakdown by year from 1 January 2023 to 15 May 2026, including the systems involved.

YEAR	2023	2024	2025	2026	GRAND TOTAL
TOTAL INCIDENTS	<5	6	12	5	26
TOTAL REPORTED TO ICO	<5	5	11	<5	23
TOTAL REPORTED TO PSNI	0	0	0	0	0
INAPPROPRIATE ECR ACCESS	<5	<5	<5	<5	10
INAPPROPRIATE ENCOMPASS ACCESS	0	<5	10	5	16
INAPPROPRIATE LILLIE ACCESS	0	<5	0	0	<5
INAPPROPRIATE PARIS ACCESS	0	0	<5	0	<5
INAPPROPRIATE ACCESS TO PAPER MEDICAL RECORDS	0	<5	0	0	<5

* Where numbers are low we have put <5 rather than state the actual figure. To ensure that patient remain non identifiable. Disclosure of this information would breach the first data protection principle, which relates to the fair and lawful processing of personal data. Therefore, we have concluded that this information is exempt from disclosure under Section 40(2) of the Freedom of Information Act - Personal Information relating to a third party.

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- 2. In relation to those incidents, please provide the number that:**
- were addressed through informal management action;**
 - were subject to disciplinary investigation and/or disciplinary action;**
 - were reported to the Information Commissioner's Office;**
 - were referred to the PSNI.**

Incidents of inappropriate or unauthorised access to patient/service user/staff records are not specifically recorded by HR. Cases are instead, recorded under 'breach of information governance'. Cases listed under breach of information governance have been provided, however these may also include inappropriate access to other types of records.

There were **<5 cases** from 2023 to date that were subject to disciplinary action and/or investigation. A further breakdown cannot be given, as low numbers by year and by outcome may result in cases being identifiable. This figure relates to closed cases, i.e. those that are included. There are also a number of cases currently open, relating to breach of information governance. However, a specific number cannot be given due to low numbers making cases potentially identifiable.

HR do not record informal management action and therefore cannot provide figures in relation to this.

However, the Belfast Health and Social Care Trust can confirm that of the 26 incidents reported to the IG Department during this time period, 23 of these were reported to the Information Commissioners Office (ICO).

- 3. Please state whether the issue of this communication was informed, prompted or contributed to by any recorded incident, pattern of incidents, increase in incidents, audit finding, governance concern or external concern and, if so, provide general details of the nature of those recorded factors.**

The Belfast Trust's IG Department have always provided communications to staff concerning inappropriate access to Trust held records, for example through mandatory IG training, routine IG bulletins, Trust wide email notices and Trust wide screen savers. There has been further communication, which was prompted by an increase in reported incidents to the IG Department since the introduction of encompass, our electronic patient record in June 2024.

Where exact breakdowns are not held, I would be grateful for the closest available recorded information within the scope of the request.