

16 September 2026

Encompass (Epic Systems) Contract, Data Governance and Laboratory Data Flows

I am writing to request information under the Freedom of Information Act 2000 in relation to the Encompass digital patient record system and the contract with Epic Systems. Given the importance of patient safety, data protection, and accuracy of clinical information, I would be grateful if you could provide the following:

- 1. A copy of the contract (or contracts) between your organisation and Epic Systems relating to the Encompass programme. I understand that certain elements may be redacted under relevant exemptions; however, I request that as much of the contract as possible be disclosed.**

Under Section 1(1)(a) of the Freedom of Information Act 2000, Belfast Health and Social care Trust can confirm that it does not hold the contract requested.

The Encompass contract was procured and managed through regional arrangements. You may wish to contact the Business Services Organisation (BSO), which may hold information within the scope of this element of the request. Email: Foi.bso@hscni.net

- 2. Any Data Processing Agreements and Data Sharing Agreements associated with the Encompass system.**

Redacted version attached (Attachment 1).

Information has been withheld where disclosure would reveal technical architecture, integration arrangements, operational processes, security controls, support arrangements, supplier dependencies or other information that would be likely to prejudice the prevention or detection of crime. This information is withheld under Section 31(1)(a) of the Freedom of Information Act (FOIA).

- 3. Data Protection Impact Assessments (DPIAs) relating to Encompass, particularly those concerning:**

- **Patient data security**
- **Data transfers (including any transfers outside the UK)**
- **Integration with laboratory systems**

Redacted version attached (Attachment 2).

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4. Documentation describing how laboratory results are transmitted into Encompass, including:

- **The standards or protocols used (e.g. HL7, FHIR or equivalent)**
- **Governance, validation and audit processes to ensure accuracy of laboratory data.**

Belfast Health and Social Care Trust can confirm that arrangements are in place to support the secure transmission, governance and validation of laboratory information within Encompass. These arrangements operate within established information governance, digital, clinical safety and assurance frameworks.

The Trust is unable to disclose detailed technical information relating to data flows, integration methods, operational processes, infrastructure, interfaces or security controls as this information forms part of the operation of critical digital systems supporting essential healthcare services. The information is therefore withheld under Section 31(1)(a) of the FOIA.

5. Any policies, procedures, or governance documents relating to:

- **Information governance and cybersecurity**
- **Patient data accuracy and validation**
- **Ethical oversight of the system**

Redacted versions attached (Attachment 3 and Attachment 4).

Information has been withheld where disclosure would reveal technical architecture, integration arrangements, operational processes, security controls, support arrangements, supplier dependencies or other information that would be likely to prejudice the prevention or detection of crime. This information is withheld under Section 31(1)(a) FOIA.

6. Any reports, reviews, or recorded incidents relating to:

- **Errors or risks in laboratory data transmission**
- **Patient safety concerns linked to data within Encompass**

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Belfast Health and Social Care Trust can confirm that incidents affecting the transmission, availability or processing of laboratory information are recorded and managed through established operational governance, safety, incident management and assurance arrangements.

A total of 56 incidents are recorded. Detailed incident records, including technical investigations and supporting documentation, are withheld under Section 31(1)(a) of the FOIA. The Trust considers that detailed disclosure would be likely to prejudice the prevention or detection of crime because the information would reveal operational characteristics, dependencies, failure modes and resilience arrangements relating to digital systems supporting essential healthcare services.

Whilst individual incidents may appear limited in isolation, detailed disclosure across multiple incidents would contribute to a cumulative intelligence picture across system design, operations, resilience and response arrangements and therefore increase the risk of cyber-reconnaissance activity directed at essential digital services.

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

This is a qualified exemption and is therefore subject to a Public Interest Test (PIT).

I can confirm that the Trust has carried out a PIT and the outcome is to maintain the exemptions and withhold the information from release.