Belfast Health and Social Care Trust
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FOI/37924

6 October 2026

Breaches or Infringements of Social Media Policies

I would be grateful if you could provide details of any disciplinary action taken since January 2016, including, where possible and within the limits of data protection requirements:

Belfast Trust holds centralised disciplinary case information within its Electronic Employee Relations Case Management System from 1 March 2020.

For the period January 2016 to 29 February 2020, social media-related policy breach concerns were not recorded as a distinct category and may have been captured within the broader category “breach of policy/rules”, which contains 160 cases. Identifying relevant cases would require manual review, estimated at 30 minutes per case, or approximately 80 hours. As this exceeds the 18-hour appropriate limit, the Trust relies on Section 12 of the Freedom of Information Act 2000 for this period. The information below therefore relates to 1 March 2020 to 20 August 2026.

1. The number of cases investigated.

The case management system records 20 disciplinary cases where the opening reason included “Misuse of Social Media”. The system does not record, in a reportable format, whether individual cases proceeded to a formal investigation.

Therefore, under Section 1(1)(a) of the Freedom of Information Act 2000, we can confirm that the requested information is not held, and a separate figure for the number of cases that were formally investigated cannot be provided.

2. The nature of the alleged social media policy breaches.

The 20 cases were recorded under “Misuse of Social Media”. The specific nature of the alleged breaches is not captured as a separate reportable field within the case management system. To identify and extract this information would require a manual review of individual case records. We estimate that the cost of locating, retrieving and extracting the requested information would exceed the appropriate limit prescribed by the Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004. Accordingly, Section 12(1) of the Freedom of Information Act 2000 applies and the Trust is not obliged to comply with this element of the request.

However, in keeping with our duty under Section 16 of the Freedom of Information Act 2000, we have provided the number of cases recorded under the category

"Misuse of Social Media", which is the closest information held within a reportable format.

3. The outcomes of those investigations.

In accordance with Section 12 of the Freedom of Information Act 2000, the information requested is not held in a format that would allow it to be extracted without exceeding the appropriate cost limit. The system does not separately record investigation outcomes; however, it does record the closing reason for each disciplinary case. As this is the information held that most closely corresponds to the outcomes requested, the recorded closing reasons are provided below.

4. The types of disciplinary action imposed.

Recorded closing reason	Number of cases
Dismissal	<5
Fast track procedure	<5
Informal warning	6
Informal structured conversation	<5
No case to answer	<5
No further action required	<5

The categories reflect recorded case closing reasons and do not all represent formal disciplinary sanctions. Figures fewer than five have been withheld and are shown as "<5". Given the small numbers involved and the sensitive nature of disciplinary proceedings, disclosure of the precise figures, particularly when combined with other information that is reasonably accessible, could lead to the identification of individuals.

The Trust considers that the information constitutes personal data. Disclosure under the Freedom of Information Act 2000 is disclosure to the world at large. In the circumstances, disclosure of the precise figures would be unfair and would contravene the first data protection principle set out in Article 5(1)(a) of the UK GDPR. The information is therefore exempt from disclosure under Section 40(2) of the Freedom of Information Act 2000.