Belfast Health and Social Care Trust
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FOI/37939

15 October 2026

Belfast Trust Use and Governance of Microsoft 365 Copilot, Microsoft 365 Copilot Chat and related Microsoft Enterprise-AI Services during the period 1 January 2024 to 7 August 2026

Request under the Freedom of Information Act 2000 concerning Belfast Health and Social Care Trust use and governance of Microsoft 365 Copilot, Microsoft 365 Copilot Chat and related Microsoft enterprise-AI services during the period 1 January 2024 to 7 August 2026.

This request seeks corporate and technical-governance information only. I do not seek identifiable staff prompts, individual user interaction histories, patient information or other personal data.

1. Deployment and organisational scope

Please confirm whether BHSCT licensed, piloted, enabled or deployed Microsoft 365 Copilot, Microsoft 365 Copilot Chat, Copilot in Microsoft 365 applications, Security Copilot, or another Trust-managed Microsoft Copilot service during the period, giving the first date of pilot/availability and first date of substantive deployment for each service held.

Belfast Trust confirms that, during the period covered by your request, it was licensed to use a number of Microsoft Copilot and related Microsoft enterprise services.

More detailed information about individual products, dates of availability or deployment, and the Trust's specific service configuration is withheld under Section 31(1)(a) of the Freedom of Information Act 2000.

Disclosure would be likely to provide information about the composition and development of the Trust's digital environment which, when combined with other publicly available information, could assist cyber reconnaissance and prejudice the prevention or detection of crime.

Please provide any recorded deployment plan, implementation summary or governance paper showing the organisational areas or staff cohorts to which Microsoft 365 Copilot / Copilot Chat was made available.

If held, please indicate at broad-function level whether availability extended to Human Resources / Employee Relations, Information Governance / Data Protection, Whistleblowing / Raising Concerns, corporate / senior management and Belfast Trust Laboratories. **Individual user names are not requested.**

Microsoft 365 Copilot was offered, on a pilot basis, across all organisational areas of Belfast Trust. The purpose of the pilot was to investigate potential use cases and assess possible organisational benefits.

More detailed information about deployment arrangements, implementation planning, uptake, staff cohorts or operational use is withheld under Section 31(1)(a). Disclosure could assist an attacker in identifying where particular technologies are in use and in developing more credible and targeted phishing or social-engineering activity.

2. Governance, privacy and acceptable use

Please provide the policy, guidance, DPIA, risk assessment, acceptable-use rules, staff instructions or equivalent governance documents governing use of Microsoft 365 Copilot / Copilot Chat with confidential, employment, staff, patient or other personal data.

Please find attached the HSC Terms of Use document applicable to the use of these services. Information that could identify the author and their specific technical role has been withheld. This information is exempt from release under Section 40(2) of the Freedom of Information Act 2000 – Information Relating to a Third Party. This role is responsible for an important digital service, and releasing these details could increase the risk of impersonation or social engineering attacks.

Any additional detailed technical or security-related information falling within the scope of this question is withheld under Section 31(1)(a).

Disclosure would be likely to provide insight into the Trust's security controls, operational arrangements or potential areas of reliance and could prejudice the prevention or detection of crime.

Please provide any recorded guidance concerning use of Copilot to summarise, draft, analyse, search or retrieve material relating to complaints, HR / ER matters, whistleblowing, investigations, subject access requests or litigation.

Belfast Trust does not hold centrally issued guidance specifically covering the individual teams or use cases listed in your request.

The HSC Terms of Use document attached provides the relevant high-level guidance applicable to use of the service.

3. Audit, eDiscovery and retention

Please provide the recorded retention period(s) applied by or for BHSCT to Microsoft 365 Copilot interaction/audit records and to retained Copilot prompts/responses or equivalent interaction-history items, including any relevant Purview audit-retention or data-lifecycle policy descriptions.

Retention of relevant Microsoft 365 records and information is governed through the applicable Microsoft 365 information-retention and records-management policies.

More detailed information about specific retention settings, periods, configurations or operational arrangements is withheld under Section 31(1)(a).

Providing this detail could reveal the nature and extent of the Trust's audit and evidential holdings and could assist attempts to avoid detection or frustrate subsequent investigation.

Please confirm, at system level, whether Microsoft Purview Audit records Copilot interaction events for BHSCT users and whether Microsoft Purview eDiscovery is available to search preserved Copilot prompt/response interaction items. I seek the configuration / capability position, not individual logs.

At a high level, the Microsoft 365 environment provides capabilities to support audit, information search and eDiscovery activities.

Detailed confirmation of the Trust's configuration, event capture, search coverage, preservation arrangements or other operational capabilities is withheld under Section 31(1)(a). Disclosure could reveal the nature and extent of the Trust's monitoring and investigative capabilities and could assist a malicious actor in adapting their activity to reduce the likelihood of detection.

Please identify the organisational function or HSC body responsible for administration of the Microsoft 365 tenant, Purview Audit and eDiscovery services used by BHSCT.

If the relevant configuration is held regionally rather than by BHSCT, please provide any record held by BHSCT identifying the responsible body/service.

The relevant organisational body for the purposes of this request is Belfast Health and Social Care Trust.

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4. Information-rights search guidance

Please provide any recorded instruction, procedure, checklist, training or guidance used by BHSCT Data Protection / Information Governance / FOI staff on when Microsoft 365 Copilot or other enterprise-AI repositories should be considered during searches for subject access requests, data-protection complaints, FOI requests, internal investigations or litigation disclosure.

Belfast Trust refers you to the high-level HSC Terms of Use document attached.

More detailed operational or technical information concerning how searches are undertaken, including the systems, repositories, records or search capabilities considered, is withheld under Section 31(1)(a).

Disclosure could reveal the scope and limitations of the Trust's information-search and investigative arrangements and could provide information capable of being used to avoid detection.

Please provide any recorded search or preservation guidance addressing Copilot prompts/responses, CopilotInteraction or equivalent Purview audit records, and AI interactions stored or searchable through Exchange Online/eDiscovery.

Belfast Trust does not hold centrally issued guidance specifically addressing the individual Copilot records, audit-event types or AI interaction records identified in your request.

Where information is not held, Section 31(1)(a) is not being relied upon. Any relevant high-level requirements are addressed through the HSC Terms of Use document attached.

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 31 is a Qualified Exemptions and is therefore subject to a Public Interest Test (PIT). We have now carried out a PIT and the outcome is to maintain the exemption and withhold the information from release.