

FOI 3597

23rd February 2026

FREEDOM OF INFORMATION ACT 2000 – INFORMATION REQUEST

**I am making a request under the Freedom of Information Act 2000.
Please provide the following information:**

The Trust's policies, procedures, and guidance regarding staff access to the Encompass system.

Response:

Please see guidance for staff that relates specifically to encompass.

Attachment 1 - Guidance for Southern Trust Staff Recording, Accessing & Making use of Information on Encompass

Trust staff are also required to comply with the Information Governance Policy, the UK GDPR and Data Protection Act 2018 Policy (attachment 2 & attachment 3) and the Department of Health (DoH) Confidentiality Code of Practice.

Attachment 2 – Information Governance Policy

Attachment 3 - Southern HSCT UK General Data Protection Regulation and Data Protection Act 2018 Policy

[Code of Practice on Protecting the Confidentiality of Service User Information | Department of Health](#)

The circumstances under which a manager or staff member is permitted to access an individual's medical records when they are not directly involved in that person's clinical care.

Response:

Managers or staff who are not directly involved in a person's clinical care may only access medical records in limited, authorised, and lawful circumstances, such as audits, investigations, statutory duties, or necessary administrative processes. All access must be justified proportionate and compliant with the law and Trust policy.

The policies governing the sharing of medical information obtained via Encompass with other staff members, including non-clinical staff.

Response:

Medical information accessed through encompass is governed by the Trust's existing Information Governance framework, including the Information Governance Policy, the

UK GDPR and Data Protection Act 2018 Policy and the DoH Confidentiality Code of Practice.

These policies apply to all staff and require that information is accessed or shared only where necessary for their legitimate duties.

All use of encompass is also governed by UK GDPR, the Data Protection Act 2018, and the common law duty of confidentiality.

Any additional safeguards or guidance that apply when the individual has a learning disability and may lack capacity to consent.

Response:

The day-to-day processing of personal data relating to health care does not rely on consent.

The conditions that ensure the Trust processes personal information lawfully, fairly and in a transparent manner are set out in Article 6 and Article 9 of the UK General Data Protection Regulation. These conditions include, for example, complying with our legal obligations, to meet the vital interests of service users, for public health purposes and to fulfil our public duty to provide health and social care services and manage our systems.

Lawful Processing

To process personal data, the Trust must have lawful grounds for processing as provided for in the UK GDPR.

The most commonly lawful grounds for processing in a health care setting are as follows:

- Vital Interests – example / more info
- Public Task in the Public Interest – example explained below

As Health Care data is categorised as “special category”; another basis is required for the lawful processing of this data.

The most commonly used in health care settings are:

- Vital Interests
- Public Interest
- Health
- Public Health

See example below:

The processing for the Direct Care of Patients - The legal basis is:

Art 6 (1) (e) of the UK GDPR - Public task – the processing is necessary to perform a task in the public interest or for official functions, and the task or function has a clear basis in law. The Public Task Function is outlined in the Health & Social Care (Reform) Act (NI) 2009

And

Art 9 (2) (h) of The UK GDPR - The provision of health or social care or treatment or the management of health or social care systems and services. The service meets the associated condition in UK law, set out in Part 1 of Schedule 1 of the DPA 2018 for Health or social care purposes. This condition is met as the processing is necessary for health or social care purposes.

Additional information is available via the Privacy Notice available on the Trust website - [Privacy Notice | Southern Health & Social Care Trust](#)

Training provided to managers and staff regarding confidentiality, GDPR, and access to Encompass records.

Response:

Trust staff members are required to take mandatory Information Governance training on commencement, and this must be refreshed every three years.

The modules covered within the e-learning module are:

- Data protection
- When Things Go Wrong
- Practical Advice on Getting it Right
- Records Management
- Information and Useful Contacts

There is an end of training assessment at the end of the e-learning or test staff understanding and staff must pass this assessment.

The training is provided via an e-learning module that is hosted by the HSC Leadership Centre on behalf of Trusts regionally. The HSC Leadership Centre sits within the Business Services Organisation (BSO) and they may be able to provide you with a copy of the training.

Unfortunately, as the training is hosted by BSO the Trust do not hold the training in a format that would allow it to be shared with you in response to this request.

Please refer to the BSO website for further information on how to submit a FOI request to BSO - [Freedom of Information - Business Services Organisation \(BSO\) Website](#)

Encompass role-based training is provided by BSO and this also incorporates data protection requirements.

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