

FOI 3735

11th May 2026

FREEDOM OF INFORMATION ACT 2000 – INFORMATION REQUEST

Question 1. Does your organisation currently use Patient Group Directions (PGDs) to authorise the supply or administration of medicines by registered healthcare professionals?

Response: Yes

Question 2. Indicate in the table below approximately how many active, approved PGDs your organisation currently holds?

Response:

Number Range	Indicate with a cross
<20	
20-50	
50-100	
100-300	X
>300	

Question 3. If known, how many registered healthcare professionals are currently authorised to work under one or more PGDs within your organisation? Please indicate if this information is not held centrally.

Response: This information is not recorded centrally and therefore retrieving it would involve a manual search of records. As such we cannot provide this information as the cost of locating and retrieving the information exceeds the “appropriate limit” as stated in the Freedom of Information (Fees and Appropriate Limit) Regulations 2004. In order to obtain this information from a number of individual patient records would exceed the £450 limit and is therefore cost prohibitive.

Under section 12 of the Freedom of Information Act 2000, Public Authorities are not obliged to comply with an information request where to do so would exceed the cost limit.

Furthermore, under Section 16 of the Freedom of Information Act, we can advise that it would require an extensive manual review of records just to ascertain if information relevant to your request is held. As such, we advise that there is no way to refine this request to bring it within the appropriate limit.

Question 4. What system or process does your organisation currently use to manage PGD governance?

- a. Paper-based documentation and manual registers**
- b. Generic document management software (e.g. SharePoint, shared network drives)**

- c. A dedicated PGD management software system — if so, please name the system
d. Other — please describe

Response: All PGDs are available to access via SharePoint. A log is held centrally of all PGDs and their status updated when in progress of being reviewed and updated. Locally, areas that use PGDs maintain paper copy of PGDs with Signature Sheet/PGD Register identifying those authorised to administer. Each Directorate keeps an up-to-date register of Registered Staff approved to administer medicines under the terms of the PGD.

Each Department should have a Record/Audit Trail of medicines administered under the terms of the PGD.

For AHP staff approved to administer under the terms of a PGD the Professional Heads of Service will maintain an up-to-date register for their respective profession. AHP PGDS are located centrally on AHP Sharepoint page and updated as required.
There is PGD Guidance in place including a PGD Development and review flowchart.

Question 5. Please provide the name, job title, and email address of the individual responsible for PGD governance within your organisation. If this is not held centrally, please indicate who would be the most appropriate contact.

Response:

The Trust has considered this request carefully and is withholding the name and direct contact details for the requested positions. This is because we consider this information exempt under section 36(2) (c) of the Freedom of Information Act.

Refusal notice: Section 36(2) - information prejudice to the effective conduct of public affairs.

36.—(1) This section applies to—

(a) information which is held by a government department or by the Welsh Government and is not exempt information by virtue of section 35, and

(b) information which is held by any other public authority.

(2) Information to which this section applies is exempt information if, in the reasonable opinion of a qualified person, disclosure of the information under this Act

(c) would otherwise prejudice, or would be likely otherwise to prejudice, the effective conduct of public affairs.

The Trust considers that section 36 (2) (c) applies in this case, as disclosure of the names and direct contact details for staff members would prejudice the efficient and effective management of public contact. This is because staff members would be likely to find themselves dealing with emails and contact that may have been more appropriately dealt with elsewhere, which would in turn distract and impact on staff members ability and capacity to do their day-to-day work.

On its website, the Trust publishes details of the main contacts for its services [Our Hospitals | Southern Health & Social Care Trust](#). In addition, further contact details can be found under specific services on the Trust website.

Section 36 requires that the qualified person, the Chief Executive of the Trust, must give their reasonable opinion that the exemption is engaged. The Chief Executive considers section 36 is engaged.

As Section 36 is a qualified exemption, we are also required to decide on a case-by-case basis, whether the public interest in maintaining this exemption outweighs the public interest in its disclosure. The Trust has considered this below:

Factors in favour of maintaining the exemption:

- Ensuring that public contact is managed effectively and efficiently is key to providing good public services. Routing calls from the public through carefully managed publicly available numbers ensures that calls are passed on to the correct services.
- Publication of key numbers helps ensure that members of the public can easily select the correct numbers for contacting services. These numbers are carefully managed, with the aim of ensuring that there is continuity of service regardless of any internal changes to services.

Factors against maintaining the exemption:

- We do not believe that there is any public interest in disclosing direct contact details as the Trust maintains details of central points of contact page on its website.

On balance of the public interest test, we believe that public interest lies in withholding the requested information.

Question 6. In the last 12 months, have any PGDs within your organisation expired without a completed review and reauthorisation in place? If so, approximately how many

Response: Five

Email: FOI.team@southerntrust.hscni.net