

23 December 2024

**Our Ref:** FOI / 331

Dear

**Freedom of Information Act 2000  
Information in relation to Contract Register, Procurement Strategy and  
Contact Details**

I am writing to confirm that the South Eastern Health & Social Care Trust (the Trust) has now completed its search for information relating to above which you requested on 6 November 2024. Please accept my apologies for the delay in responding to your request. Thank you for your understanding and forbearance.

A response has been provided by the Planning, Performance and Informatics Directorate and is attached in Appendix A.

However, in relation to question 1 I would like to advise you that in regards to IT Contracts, the below listed titles have not been included within Attachment 1, the Trust has decided not to release the information that is held for the following reasons:

The information requested in the below titles is exempt from release under Section 31 and Section 38 of the Freedom of Information Act 2000.

- Contract Title
- Supplier Name
- Contract Description

These are all qualified exemptions and so a Public Interest Test was carried out to decide if the information should be released or not. Having weighed up the factors for and against release, it was decided to withhold this information because the disclosure of such information would:

- a) (Section 31) Leave the Trust patients, clients & staff more vulnerable to crime
- b) (Section 38) permits the withholding of information if there is a risk to Health and Safety of Individuals within the Trust. To withhold there must be a likelihood of endangerment to the physical or mental health of any individual

Section 31 – Law Enforcement Section

**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 38 – Health and safety

**Section 38 states** that as a security attack may lead to the placing of patient and client information into the public domain, the release of the requested information could potentially lead to harm for a number of patients (in a mental health context or may lead to physical harm)

The Trust believes there is a link between the risk endangerment for data subjects and the disclosure of the requested information. There would likely be a substantial detrimental effect on the physical or mental health of patients and clients, should the requested information be released

In accordance with the Freedom of Information Act 2000 this letter acts as a Refusal Notice in respect of the above listed titles within question 1 in regards to IT Contracts.

If you are unhappy as to how this request has been handled, you have the right to seek a review within the Trust in the first instance. You should write to the Information Governance Department, Lough House, Ards Community Hospital ([informationgovernance@setrust.hscni.net](mailto:informationgovernance@setrust.hscni.net)) within two months of the date of this response and your complaint will be considered and a response provided, within 20 working days of receipt.

If, after receiving a response, you remain unhappy, you can refer your complaint to the Information Commissioner at The Information Commissioner's Office –Northern Ireland, 3rd Floor, 14 Cromac Place, Belfast, BT7 2JB. It is important to note that if you refer any matter to the Information Commissioner, you will need to show evidence of having gone through the Trust's internal review procedure to try to resolve the matter with the Trust in the first instance.

If you have any queries about this letter, please do not hesitate to contact me. Please remember to quote the reference number above in any future communications.

Yours sincerely

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**Rebecca Manning**  
**Information Governance Officer**

**Q1. Contract Register Request:**

***I am seeking the full and entirety of the organisation's contract register or database. The register should include the following columns/headings or something similar:***

- ***Contract Reference -Unique reference number associated with the contract***
- ***Contract Title***
- ***Procurement Category***
- ***Supplier Name***
- ***Spend (Total, Annual or contract value)***
- ***Contract Duration***
- ***Contract Extensions***
- ***Contract Start Date***
- ***Contract Expiry Date***
- ***Contract Description [Please provide me with as much detail as possible.]***
- ***Contact Owner (Person that manages the contract register)***
- ***Contact details of section 151 officer***
- ***CPV codes/Pro-Class***
- ***How many contracts are currently held on the contract register***

***If any of the headings within your contract register has not been provided, please state this within your response.***

A1. Please see Attachment 1 – Contracts Register

Please be advised, Attachment 1 includes Social Care contracts, Pharmacy contracts and IT contracts. However, the register does not cover all of the contracts held by the Trust as some of these sit within local operational management. To obtain this information would require a manual review of records.

This would exceed the 'Appropriate Limit' as defined by the Freedom of Information Act 2000. The Trust therefore exempts the release of this information under Section 12(1).

12.-(1) Section 1(1) does not oblige a public authority to comply with a request for information if the authority estimates that the cost of complying with the request would exceed the appropriate limit.

In accordance with the Freedom of Information Act 2000 this statement acts as a Refusal Notice in respect of the remainder of the contract register data the Trust is unable to provide.

The following titles have not been included on the IT Contracts Register due to the information not being held/recorded.

- Contract Reference
- Contract Extensions
- CPV Codes/pro-class

In relation to the 'Contact details of section 151 officer' the Trust is unsure what is referred to, in order to proceed with this question please clarify further detail and the Trust will revisit your question.

**Q2. Procurement Strategy Document Request:**

- ***Can the organisation provide a full version of their Procurement Strategy for the fiscal year 2024-2025?***
- ***If the Procurement Strategy is a strategic direction (2022-2025) instead of an annual plan, please provide an update document for 2023-2024. If an update cannot be provided, please provide information on when an update is planned to be published.***
- ***We require the full document. If any parts of this document have been removed, please state this within your response.***

A2. Please see Attachment 2 - Procurement Strategy 2023 to 2025.

**Q3. Contact Details Request:**

- Provide contact details of the person responsible for API or data sharing, including [Name, Job Title, Telephone, Email Address].***
- Provide contact details of the person responsible for the actual contract's register, including [Name, Job Title, Telephone, Email Address].***

A3a. Head of Information Governance & Litigation Services,  
[informationgovernance@setrust.hscni.net](mailto:informationgovernance@setrust.hscni.net)

A3b. Social Care Contracts – Interim Head of Contracts, Social Care  
Procurement and Commissioning

Pharmacy Contracts – Pharmacy Procurement and Patient Services Lead