



9th July 2025

Our Ref: FOI 1236

Dear

**Freedom of Information Act 2000
Information in relation to Wound Care Data Collection**

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 11 June 2025.

A response to questions 1a – 1e, 2a, 2b, 3b, 4a and 4b has been provided by the Primary Care & Older Peoples Services Directorate and is attached in Appendix A.

In relation to question 3a I would like to advise you that the Trust has decided not to release the information that is held for the following reasons:

The information requested in question 3a is exempt from release under Section 31 and Section 38 of the Freedom of Information Act 2000.

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 question 3a.

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) 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

Rebecca Manning
Information Governance Officer

1. Wound Care Data Collection

Q1a. Does your ICB collect or receive data on wound care, particularly for chronic wounds (e.g. leg ulcers, pressure ulcers, diabetic foot ulcers)?

A1a. Yes, The Trust records avoidable harm incidents in relation to Pressure Ulcers, Diabetic Foot Ulcers, Leg Ulcers and Surgical site infection.

Q1b. If not, are there plans to do so within the next 12months?

A1b. N/A.

Q1c. What specific data points are collected (e.g. wound type, healing time, product usage, care setting, clinical outcomes)?

A1c. Please see Table 1 for the data points recorded.

Table 1

Pressure Ulcer Incidence in Primary and Secondary Care
Categorisation
Themes and Trends from Learning
Avoidable or Unavoidable Status
Significant Event Audit (SEA) or Serious Adverse Incident (SAI) Status

Q1d. How is this data collected (e.g. electronic patient records, community health systems, audits)?

A1d. The data is collected by the Trust reporting system and regionally agreed post incidence review.

Q1e. Is data collection standardised across providers within your ICB footprint?

A1e. Currently, only Pressure Ulcers and Diabetic Foot Ulceration incidences are standardised across providers.

2. Data Usage and Sharing

Q2a. For what purposes is wound care data used (e.g. commissioning, performance management, service planning)?

A2a. Wound care data used for, outcomes, learning, service development planning, Trust comparison, and Regional impact and Health needs analysis.

Q2b. Is this data shared outside your organisation (e.g. NHS England, research bodies, suppliers)? If yes, under what governance or agreements?

A2b. Yes, Pressure Ulcer incidence data is shared with the Public Health Agency (PHA) and the Department of Health (DOH) through the PHA.

3. Technology and Digital Systems

Q3b. Are there any current or upcoming digital transformation initiatives focused on wound care?

A3b. No, there are no current or upcoming digital transformation initiatives focused on wound care.

4. Spend and Commissioning

Q4a. Does your ICB hold data on spend related to wound care (e.g. dressings, devices, service delivery)?

A4a. No, the Trust does not hold data on spend related to wound care.

Q4b. Are wound care services commissioned centrally by the ICB or delegated to Place or provider level?

A4b. The Trust has a dedicated Tissue Viability Service.