

03/06/2026

NN-ICB/26-1603

Dear Requestor

Re: Freedom of Information Request

Thank you for your request for information, received on 5 May 2026, regarding inappropriate access and disclosure of personal data – Learning and Prevention (UK NHS Trusts). We have processed your request in accordance with the Freedom of Information Act 2000 (FOIA).

Under the FOIA, public authorities like ours are required to respond to requests for information within 20 working days. In response to your request, I can confirm that we do not hold the information requested.

Details of your request:

1. This FOI forms part of an apprenticeship project focused on understanding how NHS Trusts manage incidents of inappropriate access to, or disclosure of, personal data, and how learning is used to reduce recurrence and strengthen information governance controls.
2. Please provide the name of your NHS Trust.
3. What type of NHS Trust do you work for?
 - a) Acute Trust
 - b) Mental Health Trust
 - c) Ambulance Services Trust
 - d) Community Health and Mental Health Trust
 - e) Specialist Trust
4. Please provide copies of, or links to, the Trust's current policies or procedures relating to:
 - a) Inappropriate access to records
 - b) Inappropriate disclosure of personal data
 - c) Staff access auditing and monitoring
5. Does the Trust undertake trend analysis or thematic review of inappropriate access or disclosure incidents?

If yes, please confirm how frequently:

 - a) Monthly
 - b) Quarterly
 - c) Annually

6. Does the Trust routinely carry out system access audits following allegations of inappropriate access? If yes, please confirm which systems are subject to audit and how often (e.g. EPR or clinical systems).
7. Does the Trust have a policy for the management of Allegations Against People in a Position of Trust (for example, PIPOT, LADO, SAMA, or equivalent)? If yes, please provide copies of, or links to, this policy.
8. Are you able to provide aggregated data relating to inappropriate access or disclosure incidents, and how many were reported to the Information Commissioner's Office (ICO)?

Approximate figures are acceptable where exact figures are not held.

Year (April–March)	No. of Incidents Recorded	No. Reported to ICO
2023–2024		
2024–2025		
2025–2026		

9. Please confirm whether staff receive mandatory training covering:
 - a) Appropriate access to records
 - b) Confidentiality and data protection obligations
10. Does the Trust provide additional targeted training or communications in response to increases in inappropriate access or disclosure incidents? If yes, please describe or provide examples.
11. Please confirm whether learning from inappropriate access or disclosure incidents is:
 - a) Shared with the services or teams involved
 - b) Used to inform policy updates, training, or system controls
12. What actions has the Trust taken to address inappropriate access or disclosure, and which measures have been effective or ineffective?

Our response to your request:

The ICB does not hold this information. NHS Nottingham and Nottinghamshire ICB is a strategic commissioner of health services; it is not an NHS Trust. You may wish to contact the ICB's local NHS Trusts and how to submit a Freedom of Information request to each Trust can be found on their website links below:

- Nottingham University Hospitals NHS Trust - <https://www.nuh.nhs.uk/freedom-of-information>
- Sherwood Forest Hospitals NHS Foundation Trust - [Freedom of Information | Sherwood Forest Hospitals](#)
- Doncaster and Bassetlaw Teaching Hospitals NHS Foundation Trust - <https://www.dbth.nhs.uk/contact/freedom-of-information/>
- Nottinghamshire Healthcare NHS Foundation Trust - <https://www.nottinghamshirehealthcare.nhs.uk/c-freedom-of-information>
- East Midlands Ambulance Service NHS Trust - [Contact us :: East Midlands Ambulance Service.](#)

If you are unhappy with the way in which your request has been handled, NHS Nottingham and Nottinghamshire Integrated Care Board (ICB) has an internal review procedure through which you can raise any concerns you might have. Further details of this procedure can be obtained by contacting Lucy Branson, Director of Corporate Governance and Assurance via lucy.branson@nhs.net or by writing to FOI Team at NHS Nottingham and Nottinghamshire ICB, Sir John Robinson House, Sir John Robinson Way, Arnold, Daybrook, Nottingham NG5 6DA.

If you remain dissatisfied with the outcome of the internal review, you can apply to the Information Commissioner's Office (ICO), who will consider whether the organisation has complied with its obligations under the Act and can require the organisation to remedy any problems. Generally, the ICO cannot make a decision unless you have exhausted the complaints procedure provided by NHS Nottingham and Nottinghamshire ICB. You can find out more about how to do this, and about the Act in general, on the Information Commissioner's Office website at: <https://ico.org.uk/for-the-public/>.

Complaints to the Information Commissioner's Office should be sent to:

FOI/EIR Complaints Resolution, Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. Telephone 0303 123 1113 or report a concern via <https://ico.org.uk/concerns/>.

Yours sincerely

Freedom of Information (FOI) Officer on behalf of NHS Nottingham and Nottinghamshire Integrated Care Board nnicb-nn.foi@nhs.net

All information we have provided is subject to the provisions of the Re-use of Public Sector Information Regulations 2015. Accordingly, if the information has been made available for re-use under the [Open Government Licence](#) (OGL) a request to re-use is not required, but the license conditions must be met. You must not re-use any previously unreleased information without having the consent of NHS Nottingham and Nottinghamshire Integrated Care Board. Should you wish to re-use previously unreleased information then you must make your request in writing (email will suffice) to the FOI Lead via nnicb-nn.foi@nhs.net. All requests for re-use will be responded to within 20 working days of receipt.