

## Freedom of Information Request

Ref: 25-221

10 April 2025

By Email

Dear Sir/Madam

Thank you for your request for information under the Freedom of Information Act 2000. The Trust's response is as follows:

- We can confirm that we do hold the information you are requesting

**In 2005, the government brought in Maintaining High Professional Standards [MHPS]. This allows trusts to investigate concerns against doctors.**

**I am looking for the following information under the Freedom of Information Act because I cannot see it on your website or any publication.**

**1. How many doctors work for your trust? By the term doctor, I mean those who treat patients, not those with a PhD, and/or who are not clinicians.**

1,889

**2. Break these into their ethnic groups and their corresponding grades e.g., white, black, Asian or whichever way you ethnically monitor your staff. If, for example, positions have fewer than five doctors in their grade and ethnicity, please use an asterisk and explain there are fewer than five.**

Ethnic Group	Role	Headcount
Person of Global Majority	Associate Specialist (Closed to new entrants)	9
	Clinical Director - Dental	*
	Consultant	145
	Dental Core Trainee	*
	Dental Officer	*
	Foundation Year 1	9
	Foundation Year 2	16
	Salaried Dental Practitioner	*
	Senior Dental Officer	*
	Specialty Doctor	30
	Specialty Registrar	115
	Trust Grade Doctor or Dentist - Specialty Registrar	179
Person of Global Majority Total		513
White	Associate Specialist (Closed to new entrants)	16

	Consultant	534
	Dental Core Trainee	*
	Dental Officer	*
	Foundation Year 1	60
	Foundation Year 2	51
	General Medical Practitioner	*
	Medical Director	*
	Senior Dental Officer	*
	Specialty Doctor	54
	Specialty Registrar	357
	Trust Grade Doctor or Dentist - Specialty Registrar	134
<b>White Total</b>		<b>1,219</b>
<b>Not Stated</b>	Consultant	28
	Dental Officer	*
	Foundation Year 1	*
	Foundation Year 2	*
	Specialty Doctor	*
	Specialty Registrar	36
	Trust Grade Doctor or Dentist - Specialty Registrar	9
<b>Not Stated Total</b>		<b>82</b>
<b>Not Recorded</b>	Consultant	25
	Specialty Doctor	6
	Specialty Registrar	18
	Trust Grade Doctor or Dentist - Specialty Registrar	26
<b>Not Recorded Total</b>		<b>75</b>

Please note: Where the figures are between 1 and 5, this has been denoted by \*. Due to the low numbers, we have considered that there is the potential for individuals to be identified from the information provided, when considered with other information that may also be in the public domain. In our view disclosure of these low figures would breach one of the Data Protection Principles set out in Schedule 1 of the Data Protection Act, namely Principle 1. The Trust therefore finds that the Section 40(2) exemption contained within the Freedom of information Act 2000 is engaged. This follows NHS Digital (formerly HSCIC) analysis guidance (2014) which states that small numbers within local authorities, wards, postcode districts, providers and Trusts may allow identification of patients and should not be published.

### 3. Provide a key to explain your grading system e.g. lowest to the highest band or vice versa.

We are able to obtain this information however we have decided to apply **Section 21** of the FOIA as this information is reasonably accessible in the public domain on the following link: [Pay and conditions circulars for medical and dental staff | NHS Employers](#). Section 21 of the FOIA provides that we are not obliged to provide the requested information if it is already reasonably accessible and therefore we are withholding this information at this time.

4. In the following years, how many complaints did you receive about doctors under MHPS during the following years? 1 Jan-31 Dec 2021; 1 Jan-31 Dec 2022; 1 Jan-31 Dec 2023; 1 Jan-31 Dec 2024.
5. Please break these down into ethnic groups e.g., white, black, Asian or whichever way you record your data for the corresponding years. If your numbers are fewer than five, then use an asterisk.
6. Of these complaints, how many resulted in your investigating them? Please list these in the corresponding years.
7. Please break these down into ethnic groups e.g., white, black, Asian or whichever way you record your data for the corresponding years. If your numbers are fewer than five, then use an asterisk.
8. Of these investigations, how many resulted in a sanction, adverse judgement or other disciplinary action? Please be clear about what the sanction was. Please list these in the corresponding years.
9. Please break these down into ethnic groups e.g., white, black, Asian or whichever way you record your data for the corresponding years. If your numbers are fewer than five, then use an asterisk.
10. Of all complaints how many resulted in a doctor being suspended during the inquiry? Please list these in the corresponding years.
11. Please break these down into ethnic groups e.g., white, black, Asian or whichever way you record your data for the corresponding years. If your numbers are fewer than five, then use an asterisk.
12. Of all the complaints how many did you refer the doctor to the GMC? Please list these in the corresponding years.
13. Please break these into ethnic groups e.g., white, black, Asian or whichever way you record your data for the corresponding years. If your numbers are fewer than five, then use an asterisk.
14. During your considering complaints, what is the average length of your investigations?
15. Please give the average length of your considering a complaint in terms of ethnic groups e.g., white, black, Asian or whichever way you record your data. If your numbers are fewer than five, then use an asterisk.

Despite the number of questions, I would be incredibly surprised if you do not have all the information which I require in an easily retrievable format, and so this will not impact sec 12 of the FOIA.

Because of the size of your trust, I do not accept that there is any way in which you can use the GDPR exemption because there is no way these doctors can be identified.

This passes the threshold of the public interest case since it is examining potential racial bias in disciplinary procedures.

Neither does sec 36 apply. Should you think this applies, I will need to know who your qualified person [QP] is so I can raise the matter with the information commissioner and, if necessary, ask the first-tier tribunal (FTT) to adjudicate.

I respectfully remind you that under sec 16 of the FOIA you must help me get the information I require.

We are able to obtain this information however we have decided to apply **Section 21** of the FOIA as this information is reasonably accessible in the public domain on the Trust's website on the following link: [24-973\\_response.pdf](#)

Section 21 of the FOIA provides that we are not obliged to provide the requested information if it is already reasonably accessible and therefore we are withholding this information at this time.

This concludes our response. We trust that you find this helpful, but please do not hesitate to contact us directly if we can be of any further assistance.

If, after that, you are dissatisfied with the handling of your request, you have the right to ask for an internal review. Internal review requests should be submitted within two months of the date of receipt of the response to your original letter and should be addressed to:

Data Protection Officer  
University Hospitals Bristol and Weston NHS Foundation Trust  
Trust Headquarters  
Marlborough Street  
Bristol  
BS1 3NU

Please remember to quote the reference number above in any future communications.

If you are not content with the outcome of the internal review, you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

#### Publication

Please note that this letter and the information included/attached will be published on our website as part of the Trust's Freedom of Information Publication Log. This is because information disclosed in accordance with the Freedom of Information Act is disclosed to the public, not just to the individual making the request. We will remove any personal information (such as your name, email and so on) from any information we make public to protect your personal information.

To view the Freedom of Information Act in full please click [here](#).

Yours sincerely

**Freedom of Information Team**  
**University Hospitals Bristol and Weston NHS Foundation Trust**