

Subject Access Requests Procedure

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1 Introduction

Objective

The objective of this procedure is to provide staff across Bolton Clinical Commissioning Group with a clear guide on how to manage incoming Subject Access Records requests which could be for full or partial access to health records and non-health records.

Background

The Data Protection Act 1998, which became effective from the 1st March 2000, has been reviewed and updated under General Data Protection Regulations (GDPR) and the Data Protection Act 2018. As previous, this legislation gives every living person (or their authorised representative) the right to apply for access to information held about them by an organisation irrespective of when it was compiled.

Access to deceased patient's information is governed by the Access to Health Records Act 1990.

A record can be computerised (electronic) and / or manual form (paper files). It may include such documentation as hand written notes, letters to and from other professionals, reports, imaging records, printouts, photographs, DVD and sound recordings.

Subject Access requests relating to the CCG will normally be for access to view and /or to request copies of the following types of records which the CCG process. These are:

- Case files held by the Continuing Health Care/Complex Care Team
- HR Records and other related HR documents for CCG staff held by the CCG or Greater Manchester Shared Services (GMSS) Peoples Services
- PALS (Patient Advice and Liaison Service) / Complaints / Incidents information held by the CCG
- Safeguarding Information held by the CCG Safeguarding Lead
- Internal correspondence about a staff member could be requested under the Data Protection Act 1998 / GDPR as a Subject Access Request.

The CCG do not process original health records but they may hold copies of these as part of a complaint / CHC folder. If requests for Health Records are made, the requester will be asked to contact the Data Controller which will be either the GP Practice and /or a secondary care provider such as an NHS Trust.

It is important that all staff bear in mind when compiling records that the content could be requested under the Data Protection Act 1998 / GDPR as a Subject Access Request, and ensure that records they create are written in a way that would be appropriate to disclose.

This procedure informs staff how requests for access to information about an individual are dealt with and how CCG respond to such requests. It explains the process by which patients; members of the public; staff; legal representatives and 3rd parties can request the information.

This procedure is designed to provide a guide to best practice in handling requests but guidance should be sought from the Information Governance Team. Full implementation of this procedure will enable the organisation to:

- Comply with legal obligations under the Data Protection Act 2018 / GDPR
- Increase levels of trust and confidence by being open with individuals about the information that is held about them
- Provide better customer care
- Improve transparency of organisational activities in line with public policy requirements
- Enable individuals to verify information help about them is accurate

2 Definitions

Information Commissioner

The Information Commissioner's Office is the UK's independent authority set up to promote access to official information and to protect personal information.

Data Controller

Under the Data Protection Act 2018 / GDPR, the CCG is a data controller. That is, the organisation (or person) that determines the purposes for which and the manner in which any personal data about individuals are processed.

Data Subject

According to the Data Protection Act 2018 / GDPR, the data subject is a living individual (not an organisation) who is the subject of the personal data.

Subject Access Request

Subject Access Request is the terminology used when a person requests access to their personal information that is held by any organisation.

3 Roles and Responsibilities

Chief Operating Officer

The Chief Operating Officer has ultimate responsibility for the implementation of the provisions of this Procedure. As the Accountable Officer, they are responsible for the

management of the organisation and for ensuring that appropriate mechanisms are in place to support service delivery and continuity.

Data Protection Officer (DPO)

The DPO's role is to inform and advise the CCG and its staff about their obligations to comply with the GDPR and other data protection laws. They are required to monitor compliance with the GDPR and other data protection laws, including managing internal data protection activities, advise on data protection impact assessments; train staff and conduct internal audits.

Caldicott Guardian

The Caldicott Guardian is responsible for ensuring that the organisation is compliant with the confidentiality requirements of the Data Protection Act 2018 / GDPR.

Subject Access Request Lead

The Risk and Complaints Manager will manage Subject Access Requests and is responsible for ensuring that Bolton CCG meets its legal responsibilities and complies with internal and external governance requirements in processing applications for personal records and that a record of all Subject Access Requests is maintained.

Employees

All staff have a duty to familiarise themselves with this procedure and comply with the processes, timescales and confidentiality requirement that support this procedure. They should be aware of how to access this procedure and to seek advice from their line manager or the Subject Access Request Lead or the Information Governance (IG) Team if required.

Information Governance Board

Information Governance (IG) Board is responsible for reviewing and approving this procedure and forwarding onto other relevant groups for information. The number of SARs managed will be reported to the IG Board on a monthly basis.

4 Recognising a Subject Access Request

A Subject Access Request (SAR) is any request made by an individual or an individual's representative (see Rights of Access section) for information held by the CCG about that individual.

A SAR does not need to be made in writing, however, the requestor does not need to mention the Data Protection Act 2018 / GDPR legislation or state that they are making a SAR for their request to be valid. They may even refer to other legislation, for example, the Freedom of Information Act 2000, but their request should still be treated according to this policy.

The CCG have created a form called “Request for Access to Personal Information Form” which can be provided to a requestor, should the requestor ask to submit their request via a form. A copy of this can be found in the Appendix 1. Please note they do not have to complete this form.

A SAR can be made via any of, but not exclusively, the following methods:

- Email
- Fax
- Post
- Social Media
- Corporate Website

SARs made online must be treated like any other SAR when they are received, however, the CCG will not provide personal information via social media channels.

SARs should be identified and forwarded immediately to the CCG Risk and Complaints Manager (who is the SAR Lead), who will then co-ordinate the request and contact the Information Asset Owner to process the request.

St Peters House,
Silverwell Street,
Bolton
BL1 1PP

Or

Email: bolccg.quality-team@nhs.net

5 Rights of Access

Under the Data Protection Act 2018, any living person, who is the subject of personal information held and processed by the CCG, has a right of access to that information. This is a legal right, subject to given exemptions below. They also have the right to an explanation of any terms they may not understand (such as technical language or terminology) and the right to ask that any inaccurate information is corrected, and to request a copy of those corrections.

Subject Access provides a right for the subject to see / view their own personal data as well as to request copies of these

An individual does not have the right to access information recorded about someone else, unless they are an authorised representative, have parental responsibility, or are acting on behalf of a deceased person.

The CCG is not required to respond to requests for information unless it is provided with sufficient details to enable the location of information to be identified, and to satisfy itself as to the identity of the individual making the request.

6 Exemptions

Disclosure might cause harm / Third Party Information

Under the Data Protection (Subject Access Modification) Health Order 2000, the CCG has the right to deny patients access to all or part of their health records if one of the following condition applies:

- If, in the opinion of the healthcare professional in charge of the patient's care, access would disclose information likely to cause serious harm to the physical or mental health or condition of the patient or any other person (for example, a child in a child protection case)
- If giving access would disclose information which identifies a third party (unless the individual concerned has given consent)

Those who make the disclosure decision (e.g. healthcare professionals) must carefully consider, and be prepared to justify, any decisions to disclose or withhold information. The Caldicott Guardian must be consulted.

If information has been withheld, the CCG is free to advise applicants of the grounds on which information has been withheld – but they are not obliged to do so. For example, the CCG may not wish to volunteer the fact that information has been withheld if they believe that such a disclosure would cause undue distress, or if it might jeopardise a child protection investigation.

Child Protection / Safeguarding Concerns

There may be situations in which access to all or part of a child's health records can be refused – for example, where there are ongoing child protection issues, or where releasing information may put a child or young person at risk of harm. In these cases, advice must be sought from the appropriate managers and child protection professionals, as well as the Caldicott Guardian, before releasing any information.

Third Party Disclosure

Where records contain information that relates to an identifiable third party, that information may not be released unless:

- The third party is a health professional who has compiled or contributed to a health record, or who has been involved in the care of the individual.
- The third party, who is not a health professional, gives their written consent to the disclosure of that information
- It is reasonable to dispense with the third party's consent (taking into account the duty of confidentiality owed to the other individual, any steps taken to seek his/her consent, whether he/she is capable of giving consent and whether consent has been expressly refused)

Repeat of Earlier Request / Manifestly Unfounded

Where requests are manifestly unfounded or excessive, in particular because they are repetitive, you can:

- charge a reasonable fee taking into account the administrative costs of providing the information; or refuse to respond.

Where you refuse to respond to a request, you must explain why to the individual, informing them of their right to complain to the supervisory authority and to a judicial remedy without undue delay and at the latest within one month.

Information relating to the deceased

Applications for access to health records of the deceased are made under the Access to Health Records Act 1990. Records made after 1st November 1991 can be made available to a patient representative, executor or administrator. Any person with a claim arising from the death of a patient has a right of access to information specifically relating to the claim.

The person making the request must explain why they need access to the records and too which part of the record supports their claim.

The request should normally be made to the last known record holder, unless there are extenuating circumstances, such as concerns over the treatment the deceased person received. In such cases, advice must be sought from the Caldicott Guardian.

Health records relating to deceased people do not carry a common law duty of confidentiality. Please note that the CCG would not process these. However, it is the policy of the Department of Health and the General Medical Council (GMC) that records relating to the deceased people should be treated with the same level of confidentiality as those relating to living people. For example, if the record contains a note made at the patient's request that they did not want a particular individual to know the details of their illness or their care, then no access should be granted to that individual.

In addition, the record holder has the right to deny or restrict access if it felt that disclosure would cause serious harm to the physical or mental health of any other person, or would identify a third person.

If access to deceased patient records is requested this would only apply to the Continuing Health Care Team / Safeguarding Teams or any other service in the CCG providing "direct patient care".

Requests for deceased patients GP records must be transferred to the Primary Care Support Service (<http://www.pcass.nhs.uk/>).

Dealing with Joint Records

Where joint records are held, the relevant organisations must be informed of the access request and agree who will lead the disclosure process. However, requests for joint records should not have to be made to both organisations. Either organisation can provide the information requested provided the applicant is informed that the information is jointly held.

The term 'joint records' does not include records that contain information provided by one organisation to the other. While the information held by each organisation might be similar, they cannot be considered as joint records. In such cases a separate application must be made to each authority.

7 Requests from Parties other than the Subject

Requests for Access to Records Made by a Patient Representative.

Any person can authorise a representative to access information held about them on their behalf. This must be done in writing, with confirmation of the representative's identity and relationship to the patient.

Representatives able to provide evidence that they are acting under a Power of Attorney or a Court of Protection Order will be granted access to information held about an individual.

Where an individual who is physically or mentally disabled and unable to provide written consent for a representative to seek access on their behalf, the CCG will give the individual as much assistance as possible, in order to ascertain whether consent has been granted by other means to the representative.

Request for access by other organisations - Various external organisations and agencies may request information held about an individual. In almost all cases, staff must not share any information unless they have consent from the individual. Advice should be sought from the SAR Lead. Examples of requests from other agencies are listed below:

Solicitors

Solicitors may apply to see information held about their client, but informed, explicit and signed consent must first have been obtained from the individual before a copy of the information is released. The solicitor should be given access only to the information and explanation that would otherwise have been made available to the individual, subject to the restrictions stated above.

Court Order/Police

A Court may order disclosure information (e.g. under the Civil Procedure Rules, the Data Protection Act 2018). Unlike a request from a solicitor, a Court Order should be obeyed unless there is a robust justification to challenge it, in which case the CCG may challenge the order through the

Court. The Court's decision is law, unless the CCG decides to appeal the order and take the case to a higher Court in an attempt to override the Court's decision.

Courts and Coroners are entitled to request original records. If they do, copies of the record must be retained by the CCG. Coroners normally give sufficient notice for copies to be made, but have the power to seize records at short notice, which may leave little or no time to take copies.

All Court Orders or documents appertaining to or alluding to be a Court Order should be forwarded immediately to Caldicott Guardian.

Article 11 of the Data Protection Act 2018 allows (but does not require) personal data to be disclosed to assist in the prevention or detection of crime and the apprehension or prosecution of offenders. Any request by the Police for access to information held about an individual must be accompanied by the relevant consent form from the Chief Superintendent of the requesting police force.

The Crime and Disorder Act 1998 also allows (but does not require) the CCG to disclose information to the police, local authority, probation service, or health authority for the purposes of preventing crime and disorder. For the CCG to consider releasing any information without consent, the access request must relate to a serious crime in line with the Crime and Disorder Act 1998 (for example, murder or rape), otherwise the Police should be asked to obtain a Court Order or written approved signed consent (see above regarding Court Orders).

All such requests from the Police should be in writing and forwarded immediately to the Caldicott Guardian and the relevant IG Officer.

Department of Work and Pensions

Article 11 of the Data Protection Act 2018 allows (but does not require) personal data to be disclosed to assist in the assessment or collection of any tax or duty. Any request by the Department of Work and Pensions for access to any information held about an individual must be accompanied by the relevant form.

The individual should be asked (if possible) for their informed, explicit and signed consent to disclose the information, unless this would prejudice the enquiry or court case.

Research Organisations

Although research is considered an important factor in improving healthcare, the Information Commissioner does not consider it an essential element in the provision of healthcare.

If personal identifiable or pseudonymised information is required, informed, explicit and signed consent must be obtained. Service users are generally aware and supportive of research, but it is not reasonable to assume that they

are aware of, or likely to consent to, each and every research subject or proposal.

If it is sufficient for the purposes of the research to use anonymised data, consent is not required, but patients should be informed by posters and/or leaflets how their information may be shared.

Parental Responsibility - Parents, or those with parental responsibility, will generally have the right to apply for access to information held about a child, although disclosure may be refused if the child is deemed competent as per the “Gillick competent” and refuses to give consent. For further information regarding parental rights of access refer to:

https://www.nhs.uk/NHSEngland/thenhs/records/healthrecords/Pages/what_to_do.aspx

Parental responsibility is defined in the Children Act 1989 as ‘all the rights, duties, powers, responsibilities and authority which by law a parent of a child has in relation to the child and his/her property’.

Married parents both have parental responsibility, unless a Court Order has removed that status from any party. A separated or divorced parent who no longer lives with the child has parental responsibility unless a Court has removed that status from either party.

Parental responsibility endures if the child is in care or custody. It is lost, however, if the child is adopted.

If the parents are not married, only the mother automatically has parental responsibility. The father may acquire it in the following ways:

- Registering the birth, along with the mother, as the child’s father (for children born after 1st December 2003)
- Formal agreement with the mother (Section 4 of the Children Act 1989) – agreement can then only be brought to an end by a Court
- Marrying the mother
- Obtaining a court order
- Obtaining a residence order

In practice, parental responsibilities would include:

- Safeguarding a child’s health, development and welfare
- Financially supporting the child
- Maintaining direct and regular contact with the child

Parental responsibility can also be acquired

- Through an appointment as the child’s guardian
- By way of a residence order from the Court
- By anyone having an Adoption Order made in their favour

Through Section 2(9) Children Act 1989 – “A person who has parental responsibility for a child may not surrender or transfer any part of that responsibility to another but may arrange for some or all of it to be met by one or more persons acting on his behalf”.

A Local Authority can acquire parental responsibility by:

- Emergency protection (local authority)
- Interim or Full Care orders (local authority)

In this case the parents do not lose parental responsibility but the local authority can limit the extent to which a person exercises their parental responsibility.

Where, in the view of a health professional, the child is not capable of understanding the application for access to records, the CCG is entitled to deny access as being against their best interests.

Legally, young people aged 16 and 17 are regarded to be adults for the purposes of consent to treatment and the right to confidentiality. As such, if a person of this age wishes any information about them to be treated as confidential this wish should be respected and they have the right to deny parental access to information held about them.

Individuals living abroad - A request for access to information held about an individual made from outside the UK will be treated in the same way as a request made from within the UK. People living outside of the UK have the same rights of access to information an organisation holds about them as UK residents do.

8 Subject Access Request Process

Appendix 3 provides a map of the process for dealing with Subject Access Requests

Where the request is for information held by a service that is managed by the CCG, for example Continuing Healthcare, the person in the CCG responsible for managing Subject Access Requests, the CCG SAR Lead will follow the procedure below. Where the information is held by a service that is commissioned by the CCG from the Greater Manchester Shared Services (GMSS) for example IT, the IG Team will manage the request. The IG Team are referred to in the process below, but on occasion, as above, these responsibilities will be undertaken by the relevant person in the CCG. Where the information is held by Bolton NHS Foundation Trust, specifically Human Resources, the SAR Lead will liaise with the HR team at the Trust.

The steps below outline how a Subject Access Request will be managed.

- **Receipt of Request** - Requests for information held about an individual should be directed to the identified CCG SAR Lead. The SAR Lead will acknowledge the request and log it on the relevant Subject Access Request logbook.
- **Confirmation of identity / further clarification** – The CCG SAR Lead needs to be satisfied they know the identity of the requestor and should not request a lot more information if the identity of the person is known to them. Where ID is required ideally the requestor should provide 2 forms; a photo ID e.g. passport /

driver's license and a utility bill. See Appendix 2 for full list of ID that may be provided. ID can be photocopied and posted to the CCG or it can be scanned and emailed to the CCG.

- **Member of staff ID checks** – The SAR Lead needs to check the identity of anyone making a SAR request to ensure information is only given to the person entitled to it. In the first instance, check with a staff members line manager that the staff member who makes the request is who they say they are. If this can be confirmed then they do not need to present two forms of ID. Also check if there are any other circumstances which you need to be aware of pertaining to the request.
- **Forms** – The requestor may be asked to complete a form to better enable the CCG to locate the relevant information. The CCG SAR Lead will forward the relevant form to the requestor, see Appendix 1, however, while the CCG may ask for a form to be completed in order to assist with internal processes, this cannot be insisted upon and failure to complete a form cannot stall the 1 month response timeframe.
- **Confirmation** – Once the relevant ID has been received, the CCG SAR Lead will confirm this to the requestor and notify them that their request will be responded to within a month. The period begins from the date that the ID is received / ID confirmed. The requestor will be informed if there will be any deviation from the 1 month timeframe, however, such deviation should be an exception and be escalated to the Caldicott Guardian prior to informing the requestor.
- **Collating** – The CCG SAR Lead will contact the relevant departments and ask if any information about the requestor, or other individual if the requestor is a third party, is held by them. This may involve an initial meeting with the department to go through the request if required. The department will be provided with a deadline to respond back to the CCG SAR Lead either with the information requested or to state they do not hold any. A further meeting may need to be arranged to review and check the information. This review checks if any of the information is subject to an exemption / redaction / and or if consent is required from any third party. The team will be expected to complete a SAR Disclosure Proforma (Appendix 4) to confirm what information has or has not been disclosed.

If the request relates to patient data the request must be copied to the CCG Caldicott Guardian.

- **Refusing a request** – The CCG SAR lead will draft a letter to respond back informing the data subject that the CCG have grounds of refusing a Subject Access Request. Under GDPR grounds for refusing to process a Subject Access Request are; if the request is manifestly unfounded or excessive.
- **Response** – The finalised response will be collated together with the information retrieved from the department(s) or a statement that the CCG does not hold the information requested. A written response will be sent back to the requestor. The CCG SAR Lead will check how the requestor would like the information, for example if they prefer the transfer to be done

electronically then the CCG SAR Lead should ensure they send it via this format.

- **Logging** – After the response has been sent to the requestor the SAR will be considered closed and the log will be updated accordingly by the CCG SAR Lead. All sent emails in personal folders are to be saved in a file on the network drive.
- **Monitoring and Reporting** – The SAR Lead will routinely monitor the requests and the CCG's Information Governance Board will receive regular reports regarding the number of requests received and any issues relating to them, such as difficulty obtaining information, internal reviews and complaints.

9 Fees

Under the new Data Protection Act 2018 / GDPR information must normally be provided free of charge. A fee may be made if the request is 'manifestly unfounded or excessive.' There may be a reasonable charge for further copies.

10 Accessibility

Every effort will be made to provide the requestor with information in an accessible format. Requests for information in large print, translated or audio format will be considered on a case by case basis, and may not necessarily be met. However, the CCG will help individuals to understand information where possible.

The Data Protection Act 2018 / GDPR require that information is provided in an 'intelligible form'. The CCG is not required to translate information or decipher poorly handwritten notes, but best practice would be to help individuals where there are barriers to understanding the information.

If information is coded, and it is not possible for people outside of the organisation to understand to coded information, the CCG is required to provide access to the code.

11 Timescales

The CCG will respond to requests for access to information held about an individual within a month.

If the application does not include sufficient information to identify the person making the request or to locate the information, that information should be sought promptly and the month period begins when it is supplied.

12 Complaints / Escalation Procedure

If an individual or their representative is not satisfied with the outcome of their request, for example, if they feel information has been withheld or recorded incorrectly, or that they have not been allowed sufficient time to view the information, they should be informed of the options available to them to take further action.

These options include meeting with the CCG, escalating the matter to the CCG's Caldicott Guardian, escalating the matter to the Information Commissioner's Office, and seeking independent legal advice.

In the first instance, the individual should be encouraged to attend an informal meeting with a view to addressing and resolving the issues locally with the CCG SAR Lead.

An individual can escalate their concerns to the CCG's Caldicott Guardian.

An individual can escalate their concerns to the ICO using the following contact details

The Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Tel: 01625 545 745
e-mail: mail@ico.gsi.gov.uk

An individual may wish to seek legal independent advice to progress resolution of their concerns. In all cases, wherever possible, local resolution should be sought. However, the individual has the right to pursue any of these channels at any time and may wish to pursue several actions simultaneously.

13 Training and Awareness

Specific training will be provided to staff who are identified as holding information that could be subject to a Subject Access Request.

Staff belonging to relevant teams will be required to complete IG Training in this area.

All staff will be made aware of Subject Access and the requirements of the CCG to respond within the statutory timeframe.

14 Dissemination and Implementation

Dissemination

This procedure will be published on the CCG's website and awareness will be raised via the weekly newsletters.

Implementation

All CCG staff will be made aware of this procedure through generic and specific training programmes and guidance materials, which will be regularly reviewed and updated.

The GMSS Information Governance Team will support staff in the process.

15 Further Information

Further information or advice on the content or application of this procedure is available from:

- bolccg.quality-team@nhs.net
- Caldicott Guardian for GMSS
- The Information Commissioner's Office (see section 13 for full details)

16 Other relevant documents

This procedure should be read in conjunction with the following Bolton CCG Policies:

- IG001 Information Governance Policy
- IG002 Confidentiality and Data Protection Policy
- IG005 Records Management Policy
- IG012 Secure Transfer of Information Guidance

Appendix 1

Request for Access to Personal Information Form

Under the Data Protection Act 2018 / GDPR, you have the right to request to any personal information we may hold about you as an organisation. This is known as a Subject Access Request. (A Subject is an individual who is the subject of personal data).

To help us be clear about your request please complete this form and send back to:

Post:

Subject Access Request
St Peters House
Silverwell Street
Bolton
BL1 1PP

Or

Email: bolccg.quality-team@nhs.net - please ensure your write 'Subject Access Request' in the subject field of the email

| | | |
|----|--|-------------------------|
| 1. | Applicant's Full Name | |
| 2. | Applicant's Date of Birth | |
| 3. | Applicant's Current Address | |
| 4. | Applicant's Previous Address (if applicable) | |

.....
5. Applicant's Telephone Number:

Home Telephone No:.....

Mobile Telephone No:.....

6. To help us search for the information you require, please tell us the about the information you require with as much detail as possible. For example, copies of personnel file between (date) and (date). If we do not receive enough information to process you request, we may be unable to process your request.

.....
.....
.....
.....
.....
.....
.....

7. The information requested is about me?

Yes

No

I confirm that I am the Data Subject

Signed:

Print Name:.....

Date:.....

I enclose a photocopy of 2 of the following items as proof of identity.

Please tick on the attached form which 2 forms of identity have been enclosed.

If you require information to go to a representative then please give the name and address of the representative.

Name of representative and address where information is to be sent:
.....
.....
.....
.....

8. If you require a representative to access information on your behalf then please complete the below

I give my permission for.....
to request access to my personal information as described in question 8 (below) of this form.

Signature of Data Subject.....
Print Name:.....
Name of representative and address where information is to be sent:
.....
.....
.....
.....

9. I confirm that I am the representative

Signed:.....
Print Name:
Date:

We will make every effort to process your Subject Access Request as quickly as possible within the month time limit.

However if you have any queries whilst your request is being processed, please do not hesitate to contact the Subject Access Request Team at the CCG.

Appendix 2 - ID Checklist

Acceptable ID documents for Subject Access Requests

To make a Subject Access Request for yourself, you may be asked to provide two forms of ID documentation, to confirm identity and address, before any information will be released.

All forms of acceptable documentation are listed in the tables below. Please note, two documents from the lists below should be provided (please send copies not originals):

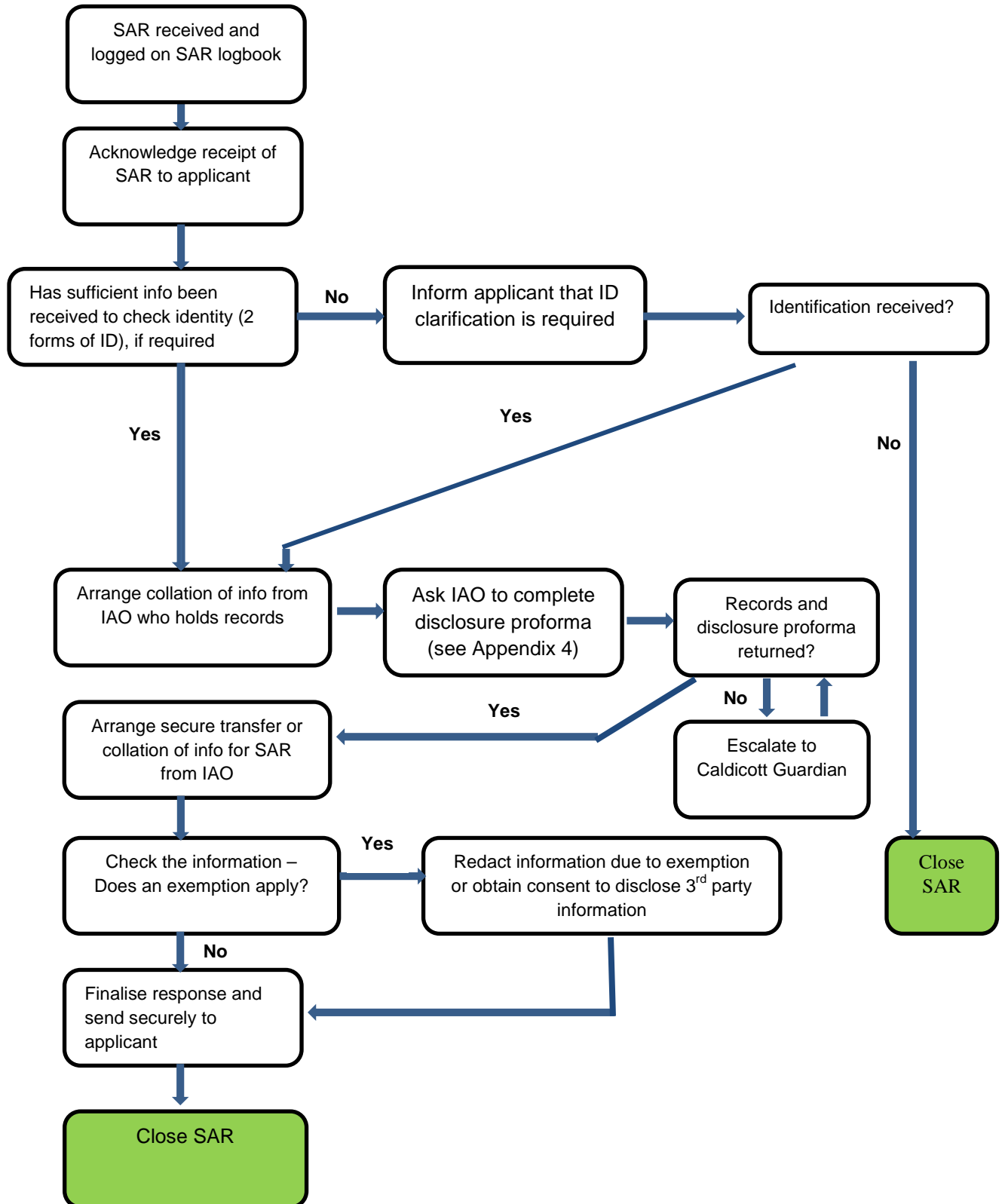
Please tick against the documents you have provided.

| PROOF OF IDENTITY | |
|--|---|
| | Current UK (Channel Islands, Isle of Man or Irish) passport or EU/other nationalities passports |
| | Passports of non-EU nationals containing UK stamps, a visa or a UK residence permit showing the immigration status of the holder in the UK * |
| | Current UK (or EU/other nationalities) Photo-card Driving Licence (providing that the person checking is confident that non-UK Photo-card Driving Licences are genuine) |
| | A national ID card and/or other valid documentation relating to immigration status and permission to work* |
| <i>Any documents not listed above are not acceptable forms of photographic identification e.g. organisational ID card.</i> | |
| | Full UK Birth Certificate – issued within 6 weeks of birth |
| | Current Full Driving Licence (old version); (Provisional Driving Licences are not acceptable) |
| | Residence permit issued by Home Office to EU Nationals on inspection of own-country passport |
| | Adoption Certificate |
| | Marriage/Civil Partnership certificate |
| | Divorce or annulment papers |
| | Police registration document |
| | Certificate of employment in HM Forces |
| | Current benefit book or card or original notification letter from the Department of Work and Pension (DWP) confirming legal right to benefit |
| | Most recent HM Revenue and Customs (previously Inland Revenue) tax notification |
| | Current firearms certificate |
| | Application Registration Card (ARC) issued to people seeking asylum in the UK (or previously issued standard acknowledgement letters, SAL1 or SAL2 forms) |
| | GV3 form issued to people who want to travel in the UK without valid travel documents |
| | Home Office letter IS KOS EX or KOS EX2 |
| | Building industry sub-contractors certificate issued by HM Revenues and Customs (previously Inland Revenue) |

| CONFIRMATION OF ADDRESS | |
|-------------------------|---|
| | Recent utility bill or certificate from a supplier of utilities confirming the arrangement to pay for the services on pre-payment terms (note: mobile telephone bills should not be accepted as they can be sent to different addresses). Utility bills in joint names are permissible* |
| | Local authority tax bill (valid for current year)* |
| | Current UK photo-card driving licence (if not already presented as a personal ID document) |
| | Current Full UK driving licence (old version) (if not already presented as a personal ID document) |
| | Bank, building society or credit union statement or passbook containing current address |
| | Most recent mortgage statement from a recognised lender* |
| | Current local council rent card or tenancy agreement |
| | Current benefit book or card or original notification letter from Department of Work and Pensions (DWP) confirming the rights to benefit |
| | Confirmation from an electoral register search that a person of that name lives at the claimed address* |
| | Court Order* |

**** The date on these documents should be within the last 6 months (unless there is a good reason for it not to be e.g. clear evidence that the person was not living in the UK for 6 months or more) and they must contain the name and address of the applicant***

Appendix 3 - Subject Access Request Process Flow map



Appendix 4 - Subject Access Request Disclosure Proforma

| | |
|--|--|
| IAO Name: | |
| Department: | |
| Details of information supplied: Please include number of copies / date ranges / page numbers and source | |
| Format information to be supplied: Email / hard copy | |
| I confirm that the information provided for the Subject Access Request is a complete and accurate record of the information requested by the applicant. | |
| Signed: | |
| Date: | |