

Subject Access Request Policy and Procedure V2.2

POLICY DOCUMENT – VERSION CONTROL CERTIFICATE

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CIRCULATION LIST

Prior to 1st Approval, this Policy Document was circulated to the following for consultation:

Trafford IG Group, inc:
Caldicott Guardian
SIRO
IG Manager
Head of Governance, Planning & Risk
Head of Information

Following Approval this Policy Document will be circulated to:

All staff

Notification to CCG staff via Staff News Bulletin
CCG Intranet
CCG Internet

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SUBJECT ACCESS REQUESTS PROCEDURE

1 Introduction

- 1.1 The Data Protection Act 1998 gives every living person (or their authorised representative) the right to request access to information held about them by an organisation irrespective of when it were compiled.

Access to deceased patient's information is governed by the Access to Health Records Act 1990. GP deceased records are held by the by Primacy Care Support Service (PCSS). Any requests for deceased GP patient's records must be referred to PCSS. The Continuing Health Care Team hold case files regarding deceased patients.

- 1.2 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.

- 1.3 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 Continuing Health Care Team / Personalised Care Team
- HR records and other related HR documents for CCG staff held by Human Resources within the CCG
- Complaints / Incidents information held by the Incident Manager
- Safeguarding information held by the Safeguarding Lead for the CCG
- Internal correspondence about a staff member could be requested under the Data Protection Act 1998 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 either be the GP and / or a secondary care 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 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 the 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 reflect best practice in handling requests for information about an individual. Full implementation of this policy will enable the organisation to:

- Comply with legal obligations under the Data Protection Act 1998
- 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 that information held about them is accurate

2 Responsibilities and Definitions

2.1 Data Controller

Under the Data Protection Act 1998, 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.

2.2 Data Subject

According to the Data Protection Act 1998, the data subject is a living individual (not an organisation) who is the subject of the personal data.

2.3 CCG IG Lead

The CCG IG Lead has a duty to ensure that the requirements of the Data Protection Act 1998 are upheld and the Accountable Officer has overall responsibility for implementation of this policy.

2.4 Caldicott Guardian

The Caldicott Guardian of the CCG is responsible for ensuring that the organisation is compliant with the confidentiality requirements of the Data Protection Act 1998.

2.5 Subject Access Lead

Responsibility for management of subject access requests lies with the Governance Support Officer in the Governance, Planning and Risk Department.

2.6 Employees

Heads of Service and Managers are responsible for ensuring that information is disclosable under the requirements of the Data Protection Act, and for ensuring that requests for information are provided in a timely fashion. All employees, whether permanent, temporary or contract, should be aware of this policy and adhere to the principles set out. They should all be aware of how to access this policy and where to seek further advice about this policy.

2.7 Approval Responsibility

The SMT and IG Group are responsible for approving this procedure and forwarding to other relevant groups for information.

3 **Recognising a Subject Access Request (SAR)**

3.1 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.

3.2 A SAR must be made in writing, however, the requestor does not need to mention the Data Protection Act 1998 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 Information Governance Department has a form called "Request for Access to personal information form" which can be provided to a requestor to submit a subject access request. A copy of this can be found in the appendix.

3.3 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.

4 Rights of access

Under the Data Protection Act 1998, any living person, who is the subject of personal information held and processed by the CCG, has a right to request 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, or have parental responsibility.

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. The request must also be written. Verbal requests for information held about an individual are not valid subject access requests, however, if an informal request is made verbally to a member of staff it is reasonable that the requestor be provided with the information they require. If the member of staff is unsure, further guidance can be sought from the IG Team.

4.1 Exemptions

4.1.1 Disclosure Might Cause Harm / Third Party Information

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

- If, in the opinion of the healthcare professional / Head of Service, 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 / Head of Service) must carefully consider, and be prepared to justify, any decisions to disclose or withhold information. The Caldicott Guardian must be advised if there appear to be any grounds for withholding information.

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.

4.1.2 Child Protection 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.

4.1.3 Wishes of Deceased Patients

Health records relating to deceased people do not carry a common law duty of confidentiality. 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 patients records is requested this would only apply to the Continuing Health Care Team. Identity checks regarding the deceased patients legal representative / executor of will would need to be satisfied to ensure the correct recipient has access / copies of any records.

4.1.4 Repeat of Earlier Request

Access to personal information can be refused where an access request has previously been granted. The Data Protection Act permits record holders not to respond to a subsequent identical or similar request unless a reasonable interval has elapsed since the previous compliance. In determining whether a reasonable interval has elapsed, record holders should consider:

- The nature of the information
- How often it is altered
- The reason for its processing
- Whether the reason for the request(s) is also relevant

4.2 Requests from parties other than the subject

4.2.1 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.

4.2.2 Requests 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. Examples of requests from other agencies are listed below:

4.2.2.1 Solicitor

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.

4.2.2.2 Court Order

A Court may order disclosure information (e.g. under the Civil Procedure Rules, the Data Protection Act 1998). 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 records 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 CCG IG Lead.

4.2.2.3 Department of Work and Pensions

Section 29 of the Data Protection Act 1998 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.

4.2.2.4 Police

Section 29 of the Data Protection Act 1998 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.

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. **Any request by the Police for access to information held about an individual must be accompanied by the relevant consent form and / or a letter detailing the information required 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 Governance Support Officer.

4.2.2.5 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.

4.2.3 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 “Gillick competent” (see below) and refuses to give consent.

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 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 order (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.

4.3 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.

4.4 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.

Requests for access to General Practitioner records where the patient is deceased are handled by NHS England – Primary Care Support Services. Any such application for access received by the CSU will be forwarded to NHS England – Primary Care Support Services to be processed.

NHS England – Primary Care Support Services will obtain the record from storage, copy it and send to the NHS England Area Team to be reviewed.

4.5 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).

4.6 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.

5 Subject Access Request Process

Receipt of request – Requests for information held about an individual must be directed to the Governance Support Officer via email TRCCG.Mail@nhs.net or by post to the **Governance Support Officer, NHS Trafford CCG, 1st Floor Crossgate House, Cross Street, Sale, Manchester, M33 7FT**. The Policy Officer will acknowledge the request and log it on the Subject Access Request log. They will also notify the requestor of the next steps. The requestor may be asked to complete a form to better enable the CCG to locate the relevant information. The Policy Officer will forward the relevant form to the requestor, see the Appendix 1.

5.1 **Confirmation of identity / further clarification and / or fees payable** – If ID and clarification of a subject access request has not already been provided, the Policy Officer will ask the requestor to provide 2 forms of ID, one of which must be a photo ID and the other confirmation of address - see appendix 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 Governance Support Officer needs to check the identity of anyone making a subject access request to ensure information is only given to the person entitled to it. In the first instance, check with the member of staff's line manager that the member of staff who has submitted a request is who they say they are. If they are then you do not need to collate 2 forms of ID. Also check if there are any other circumstances which you need to be aware of pertaining to the request.

If any fees are payable - the Governance Support Officer will notify the requestor of the amount and details of how to pay. If the requestor is not the subject, written confirmation that the requestor is authorised to act on behalf of the subject is required.

5.2 **Confirmation** – Once the ID /clarification / fees have been received, the Governance Support Officer will confirm this to the requestor and notify them that their request will be responded to within 40 calendar days. The 40 day period begins from the date that the ID/clarification/fees are received. The requestor will be informed if there will be any deviation from the 40 day timeframe, however, such deviation should be an exception and be escalated to the Caldicott Guardian prior to informing the requestor.

5.3 **Collating** – The Governance Support Officer will contact and ask the relevant HoS (or delegated authority within the department(s) for the required information as requested in the Subject Access Request. This may also involve an initial meeting with the relevant department to go through the request if this is required. The department who hold the information must return the required information by the deadline provided by the Governance Support Officer and / or a further meeting is arranged with the HoS (or delegated person) to review and check the information. This review checks to see if there is any information which may be subject to an exemption and / or if consent is required to be collated from a third party.

The information must be reviewed / received by the given deadline to ensure the 40 calendar day timeframe is not breached. The Head of Service / IAO will be asked to complete the “Agreement to Disclosure of Records Form” to ensure they have provided all of the information requested.

5.4 **Response** – The finalised response will be collated together with the information retrieved from the department(s) and / or a statement that the CCG does not hold the information requested or that an exemption applies. A written response will be sent back to the requestor. This will be via NHSmail, unless the requestor has specified another method by which they wish to receive the response (e.g. post). The CCG will only provide information via channels that are secure. When hard copies of information are posted, they will be sealed securely and sent by recorded delivery.

5.5 **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 Policy Officer.

5.6 **Monitoring and Reporting** - The Governance Support Officer will routinely monitor the requests and the CCG SMT and IG Group 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.

6 Fees

To provide copies or facility to view records, the CCG has agreed that the following charges will apply:

Request	Fee
Electronic records	£10
Paper records	£10

Combination of electronic and paper records	£10
View only on site where records have been added to within the 40 days prior to the request	Free
View only on site where records have not been added to within the 40 days prior to the request	£10

If the requestor wishes to view records on site and later makes a request for copies this should be treated as one request and be charged at no more than £10.

Where a request relates to 'unstructured personal data', the CCG is not required to comply if the cost of doing so would exceed £450. If this is believed to be the case, please contact the Governance Support Officer.

If the requestor is unable to pay a fee, this will be escalated to the Caldicott Guardian and waiving of the fee will be considered on a case by case basis. The decision to waive the fee, or to not waive the fee, will not hold up the 40 day response timeframe.

7 Accessibility

- 7.1 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.
- 7.2 The Data Protection Act 1998 requires 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.
- 7.3 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.

8 Timescales

- 8.1 The CCG will respond to requests for access to information held about an individual within 40 calendar days.
- 8.2 When there is a fee applicable, the CCG will inform the applicant of this on receipt of the request and inform the applicant of the amount to be paid. The CCG is not required to provide the information requested until the fee has been paid.
- 8.3 If the application does not include sufficient information to identify the person making the request or to locate the information (see 4.3), that information should be sought promptly and the 40 day period begins when it is supplied.

9 Complaints

- 9.1 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.
- 9.2 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 Governance Support Officer.
- 9.3 An individual also has the option to escalate the matter to the CCG Caldicott Guardian for review.
- 9.4 An individual can escalate the matter 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

- 9.5 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.

10 Training and Awareness

- 10.1 Specific training will be provided to staff who are identified as holding information that could be subject to a subject access request. This includes the following teams:

- Continuing Health Care / Personalised Care Team
- Human Resources
- Safeguarding Lead
- Incidents / Complaints Lead

Staff belonging to these teams will be required to complete the relevant modules via the online IG Training Tool.

- 10.2 All staff will be made aware of subject access and the requirements of the CCG to respond within the statutory timeframe.

11 Dissemination

11.1 The policy will be disseminated to all departments and can be accessed on the intranet.

12 Resource Implication

12.1 Subject access requests will be managed by the Governance Support Officer.

13 Further Information

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

- Governance Support Officer TRCCG.Mail@nhs.net
- Caldicott Guardian for CCG
- Information Governance Manager **0161 873 9500**
- The Information Commissioner's Office (see Escalation Procedure section for full details)

Appendix 1

REQUEST FOR ACCESS TO PERSONAL INFORMATION

Under the Data Protection Act 1998, 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). Please complete this form and send back to:

Post: Information Governance – Subject Access Requests
Governance Support Officer
NHS Trafford CCG
1st Floor Crossgate House
Cross Street
Sale
Manchester
M33 7FT

Email: TRCCG.Mail@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. The information requested is about me?

Yes No

If **Yes**, please go to Question 8

7. The Applicant (whose data is being requested) must give permission for the information to be released to their representative.

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:

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

8. To help us search for the information you require and to keep costs to a minimum, 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.

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

9. 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 (one to be a photographic copy).

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

10. 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 40 calendar day time limit.

However if you have any queries whilst your request is being processed, please do not hesitate to contact the Governance Support Officer at Trafford CCG.

Appendix 2

ID Checklist

Acceptable ID documents for Subject Access Requests

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

All forms of acceptable documentation are listed in the tables below. Please note, ONE document from each of the tables below should be provided (please send copies not originals): **Please tick against the documents you have provided.**

PROOF OF IDENTITY	
Acceptable Photo Personal Identity Documents	
	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 identification e.g. organisational ID card.</i>	
Acceptable Non-Photo Personal Identity Documents	
	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	

To confirm the address, the following documents are acceptable:

	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

AGREEMENT TO DISCLOSURE OF RECORDS FORM

This form and documents to be released must be sent to the Governance Support Officer.

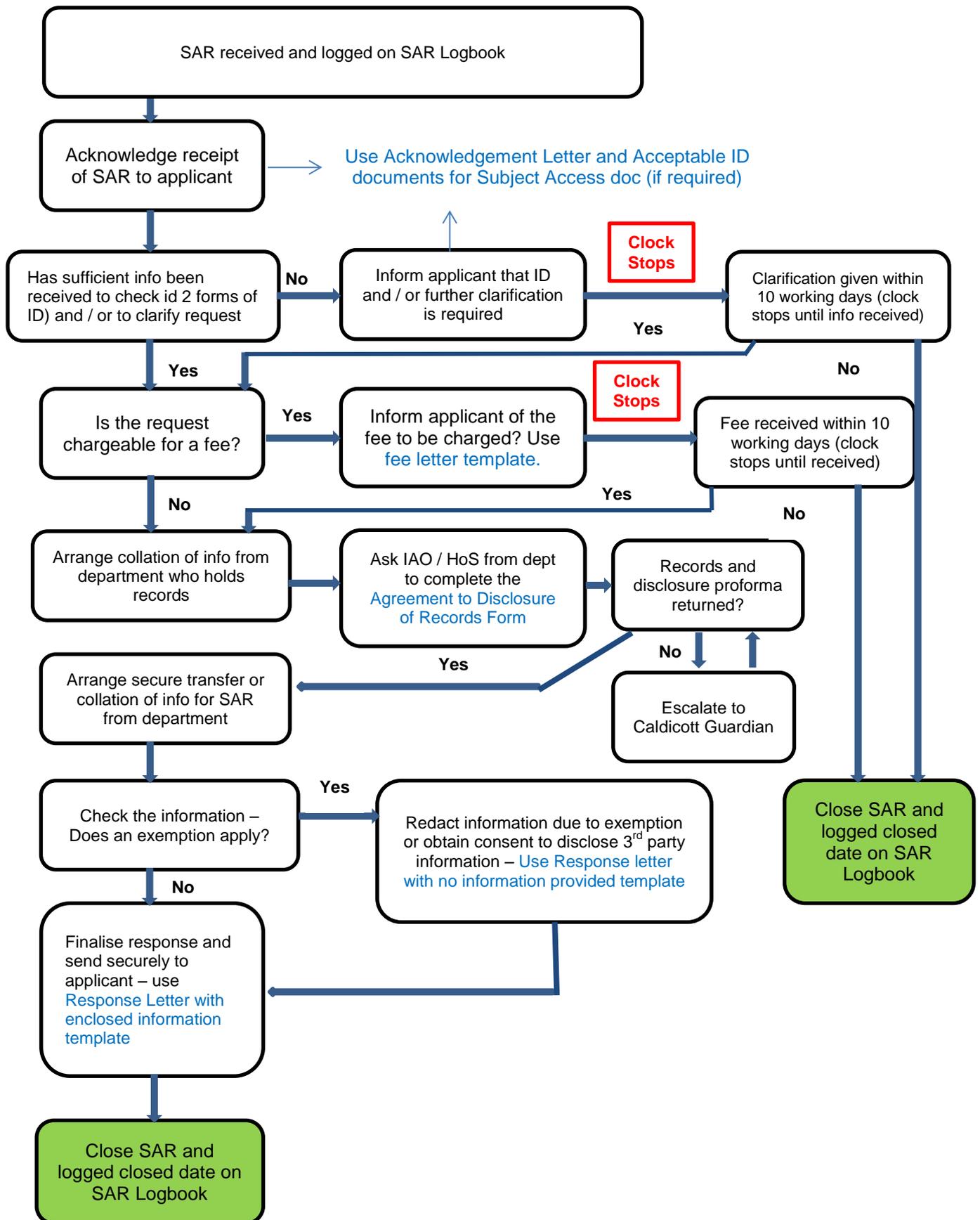
Documents must not be released directly to the applicant

1.	Applicant's Full Name
2.	Applicant's Date of Birth
3.	Applicant's Current Address

AUTHORISER'S DECLARATION – Please tick relevant box or boxes	
1. I agree to the attached records being released to the above named person or the person's named representative	<input type="checkbox"/>
2. Part or whole of the records have been withheld on the grounds that:	<input type="checkbox"/>
a. Disclosure is likely to cause serious harm to the physical or mental health of the person or of another individual	<input type="checkbox"/>
b. Access would disclose information relating to, or provided by, a third party who has not consented to their information being disclosed	<input type="checkbox"/>
c. The record contains information the person expressly stated must not be released	<input type="checkbox"/>
d. The person is under 16 and I do not think he / she fully understands what an application to see their records means	<input type="checkbox"/>
Staff Name:	
Post held:	
Signature:	
Date:	

Appendix 4

Subject Access Request Process Flow Map



Subject Access Request Process Flow Map

Procedure for managing Continuing Healthcare Subject Access Requests

