

Date Tuesday, 14 November 2017

Title of paper **Subject Access Request (SAR) Policy (CWHHE/GOV/007)**

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Clinical Lead	N/A			
Confidential	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/> Items are only confidential if it is in the public interest for them to be so

The Governing Body is asked to:

- approve the Subject Access Request (SAR) Policy (CWHHE/GOV/007); and
- delegate approval of any future amendments to the Audit Committee.

Summary of purpose and scope of report

The 2016/17 Information Governance audit flagged the absence of a specific policy on Subject Access Requests as a gap; the attached policy, drawn from other CCGs' existing policies aims to address that.

The policy sets out the requirements of its staff for managing requests to access records. In general terms, this Policy covers all records, which do or could identify an individual for which the CCG's 'hold' information.

Should the Governing Body approve the policy, it is proposed that future review and approval of amendments to the policy will be overseen by the Audit Committee and, in line with usual the 'policy on policies', any material changes will be brought back to the Governing Body.

This policy will also be disseminated via the usual internal channels, including highlighting on the Intranet.

Quality & Safety/ Patient Engagement/ Impact on patient services:

- None

Finance, resources and QIPP

- None arising directly from this adoption of the policy

Equality / Human Rights / Privacy impact analysis

This policy covers 'Subject Access Requests' (SARs) under the terms of the Data Protection Act 1998, section 7. The CWHHE CCG's deal with two categories of Subject Access Requests:

- Access to health related records e.g. patient complaint.
- Other Subject Access Requests e.g. staff personal records.

Risk	Mitigating actions
CWHHE CCGs' do not comply with central policy requirements	Regular review of the policy.

Supporting documents

- Subject Access Request (SAR) Policy (CWHHE/GOV/007)

Governance and reporting

(list committees, groups, other bodies in your CCG or other CCGs that have discussed the paper)

Committee name	Date discussed	Outcome
CWHHE Governing Bodies		