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| Name of Policy | Subject Access Request Guidance |
| Version Date | 16th October 2018 |
| Approved by | Nick Roberts, Director of Digital Services, UCLH |
| Date | 16th October 2018 |
| Review Date | October 2019 |
| Target Audience | Staff employed by UCLH, T&P and NSPCC |
| Authored by | Dawn Hodson & Emma Harewood |
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| **Version** | **Date** | **Owner** | **Changes Made** |
| 1.0 | 02/08/18 | Dawn Hodson & Emma Harewood | 1st Draft – Added onto the Lighthouse template |
| 2.0 | 16/10/18 | Emma Harewood | final version |

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| Lighthouse Policy Statement:  The Lighthouse will provide a coordinated approach to supporting children and young people who have experienced sexual abuse. All medical, advocacy, social care, police, and therapeutic support will be delivered from one place. The aim is that children, young people and their families receive the justice, support and therapy in a timely manner meaning that they can move forward towards recovering from the abuse.  NHS England (London region) in conjunction with MOPAC has commissioned the health and wellbeing services which will be provided by University College London Hospitals (UCLH), The Tavistock and Portman and NSPCC, supported by Morgan Stanley.  Lighthouse procedures and guidance will provide clarity over how staff working within the house will work as part of a multi-agency service, whilst being accountable to their own organisational policies. All Lighthouse policies will be signed off by the Lighthouse Delivery Board which has representation from all agencies |

**Summary**

This guidance outlines the lighthouse’s approach to managing Subject Access Requests. A **subject access request** (SAR) is a **request** made by or on behalf of an individual for the personal information which he or she is entitled to access. (See Lighthouse Data Protection Policy – Section Subject Access Request to see the policy outlined.) This document is a guideline document.

Subjects accessing data could be the child or young person referred to the Lighthouse or their family member. Data should only be provided relating to the individual making the SAR. For example a child should not see the records pertaining to a parent or sibling supported by the Lighthouse.

1. **Accessing Personal Information in the Lighthouse**
   * The Lighthouse is not a legal entity in its own right so does not control the data in the Case Management System.
   * The data is controlled jointly by the individual partners UCLH, Tavistock and Portman, NSPCC and MOPAC. (See The Lighthouse Data Protection Policy for Data Controller responsibilities).
   * It is important that any child or young person who wants to access their information should only have one point of contact. Therefore its is imperative that the process will be managed via the Lighthouse Service Manager (SM) via [UCLH.thelighthouse@NHS.net](mailto:UCLH.thelighthouse@NHS.net)
   * As the case management system is multi-agency with a number of professionals inputting into a single case file, it may be difficult to unpick which particular elements were input by each particular agency employee.

1. **Process for responding to a Subject Access Request (SAR)**
   * The Service Manager (SM) will confirm that the individual is known to the Lighthouse
   * The SM will liaise with the UCLH IG team to confirm it is suitable to progress the SAR ensuring there are no reasons not to proceed.
   * If the requestor is a parent/carer, the SM will check if the requestor is the alleged perpetrator, known to the alleged perpetrator or a key witness; the SM will check with Police liaison officer and/or CPS lawyer if there is likely to be any impact of responding to the SAR or reasons not to proceed.
   * The SM will aknowledge receipt of the request in writing and confirm the requestors indentity (if required)
   * The SM will provide the subject with a SAR application form to complete detailing their request.
   * The UCLH IG team will log the SAR and commence tracking to ensure that there is a response provided within 30 days from receipt of returned application form.
   * Following receipt of the completed SAR application form from the subject, the SM will review the Excelicare case files to see which staff from which individual organisations had recorded information on that CYP or family member.
   * As Lead Provider the UCLH IG team will be the principal organisation in charge of processing the request and their SAR process will be followed.
   * The Lighthouse Senior Leadership team (SM, clinical lead for paediatrics, clinical lead for health and wellbeing and NSPCC Service Manager) will review the records together and extract the relevant sections for the individual, which will be saved on the shared drive in a folder only accessible by the Lighthouse senior leadership team and admin coordinator.
   * Each member of the Lighthouse senior leadership team will liaise with their organisational IG Team to review any notes that relate to their organisation. They will have 3 working days to review and redact the notes as required.
2. **3. Process for sending out response to SAR**
   * The SM will collate all responses, review with Dr Deborah Hodes,Caldicott Lead for The Lighthouse and sign off with support from UCLH Caldicott Guardian.
   * Once agreed, the SM will provide a written response to the individual who requested the information, ensuring that records are only sent via encrypted secure email using NHSmail or with a GCSX or CJSM pre-fix .
   * The SM will inform UCLH IG team that the final response has been sent.
   * Should the individual want to come and view the records at the Lighthouse the SM will make arrangements for a suitable individual to support this.
   * The request must be processed within 30 days of receipt of the request, or of receipt of identity verification (if required). If the process is likely to take longer due to the complexity of the request, then the UCLH IG team will be responsible for notifying the requestor at the earliest opportunity.
   * Individuals will not be charged for the subject access request unless the request is manifestly unfounded or excessive, the requester may be charged a reasonable fee which will be clarified once the request has been analysed. The fee may also be applied if an individual requests further copies of their data following a request and the fee will be based on the administrative costs of providing further copies.
   * All requests will be tracked by the UCLH IG team on a Excel Spreadsheet and logged/updated as each request is moved forward on the tracker.

**Process for responding to SAR**

Subject access request received by Service manager who will check if any reason not to proceed with UCLH IG team and Police liaison officer/CPS lawyer for the case (if required)

Inform IG final response sent

Sign with support from UCLH Caldicott guardian

SM collate and review with Lighthouse Caldicott lead

Each organisational clinical lead/IG review and redact notes

Lighthouse SLT review records based on application form

SM inform UCLH IG team and confirm appropriate request

SM acknowledge receipt and send out application form

SM inform UCLH IG team once final response sent

UCLH IG team log and monitor SAR

Confirm identity of subject