

# Subject Access Request (SAR) Policy

**Effective from 25 November 2020**

Applies to all employees of NHS Cheshire CCG

Approved by the Governance, Audit and Risk Committee 25 November 2020

## Amendments Log

Any changes made to this policy should be outlined in the below Review and Amendment Log. In the event of any changes to relevant legislation or statutory procedures this policy will be automatically updated to ensure compliancy without consultation. Such changes will be communicated.

Version No	Type of Change	Date(s)	Description of change
1	Updated policy for Cheshire CCG taken to GARC (November 20)		Update for Cheshire CCG

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## **1. Introduction**

- 1.1. The Subject Access Request Policy for NHS Cheshire Clinical Commissioning Group (CCCG) 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 NHS CCCG 'holds' information.
- 1.2. This policy covers 'Subject Access Requests' (SARs) under the terms of the Data Protection Act 2018, Access to Health Records Act 1990 and also compliments General Data Protection Regulation (GDPR). NHS CCCG deals with two categories of Subject Access Requests:
  - a) access to health related records (e.g. patient records held)
  - b) other Subject Access Requests (e.g. staff personal records).

## **2. Performance Indicators**

- 2.1. The following key performance indicators have been identified to measure the effectiveness of this document:
  - a) annual Information Governance Toolkit scores;
  - b) staff will know who and where to direct Subject Access Request applications to;
  - c) percentage of incidents / complaints that might contravene the policy

## **3. Principles**

- 3.1. The Access to Health Records Act 1990 has now been repealed, except for the sections dealing with requests to records relating to the deceased.
- 3.2. The Data Protection Act 2018 is applicable to requests for access to records relating to living persons.
- 3.3. Under the Data Protection Act 2018, individuals have the right to:
  - access their records, subject to certain safeguards.
  - have copies of their records.
  - have these records explained if they are illegible or unintelligible.
  - be informed by any data controller whether personal data of which that individual is the data subject are being processed by or on behalf of that data controller.
- 3.4. Applications under The Data Protection Act 2018 cover all written mediums, e.g. paper and computer records, including emails as well as digital images and any type of voice recording.
- 3.5. Applicants do not have to give a reason for requesting access to records. The applicant's motives in requesting the records are irrelevant.
- 3.6. The 'subject' could be a patient, contractor, member of staff or member of

the public (living or deceased).

#### **4. Objectives of the policy**

- 4.1. Ensure that NHS CCG meets its obligations regarding 'subject access requests' under the terms of the Data Protection Act 2018.
- 4.2. Set out clear guidelines for NHS CCG staff to help make the access timely and within the legislation laid down by the Government.
- 4.3. Ensure that all staff are aware of their responsibilities in the management of access to records.

#### **5. Responsibilities**

- 5.1. NHS CCG's Accountable Officer shall have overall responsibility for the Subject Access Request Policy, by ensuring that all staff within NHS CCG:
  - comply with legislation, guidelines and procedures as set out and agreed within the Policy
  - work within the time scales set out within the Policy.
- 5.2. NHS CCG's Caldicott Guardian is responsible for:
  - ensuring that patient information may only be passed on for a justifiable purpose and where possible only minimum information about the patient should be used.
- 5.3. NHS CCG's Senior Information Risk Owner (SIRO) is responsible for:
  - ensuring that Person Identifiable Data (PID) and other information may only be passed on for a justifiable purpose and where possible only minimum information about the person should be used.
- 5.4. NHS CCG's Accountable Officer is responsible for:
  - Ensuring that all staff follow the process by sending the photocopies/electronic copies of requested information to them for the ultimate decision and signature.
  - Ensuring that all staff are aware of their accountability for any decision to pass on Person Identifiable Information (PID).
- 5.5. NHS CCG's Information Governance Lead is responsible for:
  - Ensuring all local procedures within the CCG will meet the requirements as set out in the Data Protection Act 2018.
  - Providing expert advice on the managements of SARs.

5.6. NHS CCG's Governance team are responsible for:

- Ensuring all requests are acted upon in a timely manner as set out in the Data Protection Act 2018.
- Ensuring all consent forms are received with accompanying identification documentation.
- Ensuring that the appropriate NHS CCG Officer has signed the Permission and Confirmation section of the request for release of records..
- Ensuring that all applicants, including solicitors, receive acknowledgement of their request.
- Ensuring a database of all requests is kept up to date and accurate.

5.7. NHS CCG's Senior Staff are responsible for:

- Ensuring all staff are made aware of the Subject Access Request Policy and the associated procedures.
- Ensuring all new staff receive training / guidance in security and confidentiality when dealing with confidential / sensitive records.
- Ensuring that the relevant documentation requested is made available.
- Ensuring that all staff are adequately trained and adhere to the guidelines.
- Ensuring that staff report any incidents or concerns about any aspect of confidentiality and security, whether a breach has taken place or a 'near miss' regarding Subject Access Requests.

5.8. All NHS CCG Staff are responsible for:

- Ensuring awareness of the Subject Access Request Policy and following the correct procedure as set out in this policy when receiving an access request.
- Ensuring the disclosure of information is carried out as laid down in the Subject Access Request Policy.
- Ensuring awareness of responsibilities to safeguard personal data and sign an undertaking that they will abide by the requirements of the organisations Data Security Policy. In order to do this staff should be given clear guidance on how to handle confidential information in all the different mediums used by NHS CCG, including electronic and paper records.
- Ensuring awareness of the clear guidance in place locally to report any incidents or concerns about any aspect of Subject Access Request

confidentiality and security, whether a breach has taken places or a 'near miss' has occurred.

## **6. Subject Access Request Guidance**

6.1. NHS CCG has the following guidance for managing requests.

### **6.2. Who Has A Right to Apply?**

#### **6.2.1. A patient**

6.2.2. Any person authorised in writing, to apply on behalf of the patient (see below also). In England and Wales, the person having parental responsibility for a child under 16 if the child agrees. If the child is competent of understanding the application, his/her consent is needed to allow access to the records, unless, in exceptional circumstances, the record holder considers that it is in the child's best interest to allow access without their consent i.e. There is a real justification for allowing access without consent. If the child is not capable of understanding the application, the person with parental responsibility has a right of access, subject to the usual safeguards/examples.

6.2.3. A child (a person under the age of 16 years) who, in the view of the appropriate Healthcare Professional, is capable of understanding what the application is about can prevent a parent from having access to the record. If the child is not capable of understanding the application, the person with parental responsibility has a right of access, subject to the usual safeguards/examples, unless, in the view of the appropriate Healthcare Professional this would not be in the child's best interest, then the holder of the records are entitled to deny access (see below also).

6.2.4. Any person appointed by the Court, to manage the affairs of a patient of any age, who is deemed to be incapable (see below also).

6.2.5. Where a patient has died the patient's personal representative or any person having a claim arising from the death. Where the patient has died, disclosure would be subject to the recorded wishes of the deceased patient (see below also).

6.2.6. Where the applicant is not the patient, the applicant should have access to only the information which would otherwise have been available to the patient, unless access to further information is deemed justifiable in the circumstances, other than in exceptional circumstances such circumstances may arise, which, exceptionally, would justify disclosure. Where the applicant is not the patient, access is not permitted where the holder of the records are of the opinion that the patient gave the information or underwent the examination / investigation in the expectation that the information would not be divulged to the applicant.

6.2.7. The applicant must declare that they are entitled to apply for access to the health records referred to. The applicant may also give their authority to a

Solicitor or anyone else they choose, to obtain copy records of the patient, on behalf of the applicant. Further enquiries may be needed to confirm the right to act of applicants other than the patient before access is given. Proof of identification may be required for access.

- 6.2.8. If the applicant is acting on the patient's behalf then it must be established in what capacity they are making the application.

### 6.3. **Requests from the Police**

- 6.3.1. An exemption in Law allows for the Police to get information without seeking the consent of the individual(s) for crime & taxation purposes.
- 6.3.2. The Police have a form specifically for this. It is referred to as a 'section 29.3 form' which allows them to approach any data controller (NHS CCG in this case) for information regarding an individual, in relation to the apprehensive of an offender (may or may not be the same person) or for the prevention of a crime, or for the prosecution of a crime.
- 6.3.3. If the Police can show that the information is needed to further their case (and this would be set out on the section 29.3 form), they can receive it.
- 6.3.4. A section 29.3 form is the safe guard to the data controller for releasing the information to the Police, in case of any objection by the data subject.
- 6.3.5. If NHS CCG does not accept whatever the Police put on the 'section 29.3 form', the Police would have to seek a court order to subpoena NHS CCG to submit the file/information to Court for a Judge to rule on disclosure.

### 6.4. **Records for Patients under the Age of 16**

- 6.4.1. The applicant must have parental responsibility. This will be by way of one of the following:
- 6.4.2. The applicant is the child's natural mother (and there are no residents or other Court Order to the contrary). We have to take the applicants / Solicitors written word for this at face value. This is often referred to as acting in loco parentis and is where the patient is under age 16 and is incapable of understanding the request. Where the patient is under age 16 but is mature enough to understand the meaning of the application and giving authority (termed as being Frazer Competent) and has consented to the applicant making this request, the authorisation of the patient and / or mother should be given. Again, we have to take the applicants / Solicitors written word for this at face value.
- 6.4.3. The applicant is the child's natural father and was married to the child's natural mother at the time of conception or birth of the child. NB the father does not necessarily still have to be married to the child's natural mother. He could be legally separated or divorced from her. Also, this whole point only applies providing that there is no residence or other Court Order to the

contrary. We can accept Solicitors written confirmation of this. Marriage / Divorce papers are not necessary.

- 6.4.4. The applicant is the child's natural father but was not married to the child's natural mother at the time of conception or birth of the child, but there is an agreement between both parents, which has been passed by a Court of Law, expressly giving the natural father parental responsibility. Documentation will exist if this is the case, and a photocopy of it should be obtained. Since December 2003 if mother agrees an unmarried father has parental rights if the child registered together and fathers name goes on the Birth Certificate.
- 6.4.5. The applicant has parental responsibility by way of a Residence Order. This could be the child's natural father, a grandparent or other relative. Documentation will exist if this is the case, and a photocopy of it should be obtained. NB a Residence Order is not time limited – up to their sixteenth birthday unless discharged.
- 6.4.6. If the applicant does not satisfy any of the above criteria, then access to the records will be denied, unless the applicant can provide the written authority of someone who has got parental responsibility.

## **6.5. Records for Patients over the Age of 16**

- 6.5.1. Patients capable of managing their own affairs - the applicant must have the written authority of the patient if they are capable of managing their own affairs.
- 6.5.2. Patients incapable of managing their own affairs - the applicant must have proof that they have the authority to act on behalf of the patient. This will be by way of one of the following:
- 6.5.3. They have been appointed by the Court to manage the patient's affairs. Documentation will exist if this is the case, and a photocopy of it should be obtained.
- 6.5.4. They are the deceased patient's personal representatives. Documentation will exist if this is the case, and a photocopy of it should be obtained.

## **6.6 Other Considerations for All Records for Patients of Any Age**

- 6.6.1. A Healthcare Professional has also got the discretion to release records to an applicant if they consider it to be in the best interests of the patient at that time and there is an overriding public interest justification why the records should be released without the authority of the person entitled to access the records. They would be responsible for their clinical judgement. A good example of this would be in a case of child sexual abuse.
- 6.6.2. A patient's dental or other such records that would be needed for purposes of identification can be released at the request of a written request from the

Coroner, a signature acknowledging receipt of such records must be provided on the appropriate form. This must be recorded and dated as per Access to Health Records.

- 6.6.3. The only other overriding rule would be if a Solicitor or the Police gained a Court Order for the organisation to release the records to the Court. The organisation would then have no choice in the matter and the Judge would decide whether or not the records should go to the Solicitor / Police / applicant.
- 6.6.4. Special permission may also be given when the interests of the public are thought to be of greater importance than the patient's confidentiality. This is very rare, but some situations where this might happen include:
  - 6.6.5. When a serious crime has been committed;
  - 6.6.6. When there are serious risks to the public or NHS staff;
  - 6.6.7. To protect children
  - 6.6.8. This permission is given by the Caldicott Guardian in charge of protecting privacy in each health care organisation.
  - 6.6.9. Special permission will be given to use patient health records without consent  
e.g. medical research, keeping registers of cancer patients or checking quality of care. This permission is given by the National Information Governance Board (NIGB). This would be under section 251 of the NHS Act 2006.
- 6.7. **When Access to Records may be denied or Partially Excluded**
  - 6.7.1. Within the Act there is provision for some information to be withheld:
  - 6.7.2. The patient does not have to be told that information has been withheld because that in itself could be damaging to them.
  - 6.7.3. The patient is not, however, prevented from asking the practitioner whether the full record has been made available, and may apply to the Courts if they are dissatisfied with the answer.
  - 6.7.4. The fact that a record has not been prepared in anticipation that it might be opened is no justification for denying access. Also, fear of legal action is not a reason for denying access.
  - 6.7.5. Healthcare Professionals are advised that records should be compiled on the assumption that they will be opened to patients and / or the Courts.
  - 6.7.6. Access shall not be given unless the holders are satisfied that the applicant is capable of understanding the nature of the application and the meaning of

the authorisation.

- 6.7.7. Where a patient has died, access should not be given to the (records / information), which in the opinion of the holder is not relevant to any claim arising out of the death. Also, if the patient has died and the record includes a note made at the patient's request that he / she did not wish access to be given to their personal representative or to any person having a claim arising from their death, access will be refused.
- 6.7.8. Access can be denied if the disclosure of information would cause serious harm to the physical or mental health or condition of the patient or any other person or if disclosure would go against the wishes of the patient unless, in exceptional circumstances, disclosure is justified even though it may go against the patient's wishes. Such circumstances would be very exceptional.
- 6.7.9. This generally refers to severe mental illness, malignancy and degenerative neurological conditions.
- 6.7.10. Where information that is adjudged to be harmful is withheld, an appointment should be made for the applicant to inspect the remainder of the record with the Healthcare Professional.
- 6.7.11. Where the records contain personal information relating to third parties unless the third party is a doctor or other Healthcare Professional who has compiled or contributed to the record or has been involved in the care of the patient in his/her capacity as a Healthcare Professional, unless their consent has been given, access shall not be given, e.g. a family member (see below also).
- 6.7.12. Where the application is on behalf of a child or a person incapable of managing his or her own affairs or where a patient has died, access may not be given to information as a result of examination or investigation where the expectation was that the information would not be disclosed.

## 6.8. **Third Party Information**

- 6.8.1. Where the third party has consented to the disclosure to the person making the request, the appropriate Manager is obliged to comply with the request and disclose the third party information.
- 6.8.2. However, consent may not have been given for one or more reasons, examples of which are:
  - 6.8.3. Consent has not been sought.
  - 6.8.4. It is not possible to obtain consent because the third party's whereabouts are unknown.
  - 6.8.5. The third party does not have legal capacity to consent.

- 6.8.6. The third party declines to consent.
- 6.8.7. Where consent has not been given (for whatever reason), the appropriate Manager is nevertheless required by the subject, access provisions to comply with the request and disclose third party information if it is reasonable in all the circumstances to disclose without consent. However, to avoid falling foul not only of the Data Protection Act 2019 and GDPT, but other provisions of law, e.g. confidentiality, disclosure without consent should not be made until proper consideration has been given to all relevant factors. The Act highlights some of the factors to be taken into account in deciding this, but the list is not exhaustive:
- 6.8.8. Any duty of confidence owed to the third party.
- 6.8.9. Any steps taken by the appropriate Manager to seek the consent of the third party.
- 6.8.10. Whether the individual is capable of giving consent.
- 6.8.11. Any express refusal of consent by the other individual.
- 6.8.12. The appropriate Manager may at the very least need to take steps to seek consent in order to demonstrate that it was reasonable in the circumstances to make the disclosure without consent.

## 6.9. **Time Limits for Access**

- 6.9.1. The Act imposes very specific duties which have to be carried out within a very tight timescale. From receipt of the application form, 14 days are allowed if the record holder needs more information, either to identify the record(s) asked for, or to check the identity of the person applying for access.
- 6.9.2. The information is to be supplied within on calendar month from the date of the request for access or within calendar month from the date sufficient information to enable you to satisfy yourself as to the identity of the person making the request/their authority to act and to locate the information requested.
- 6.9.3. However, the Department of Health states that National Health Service bodies should endeavor to comply with subject access requests within 21 calendar days where possible.
- 6.9.4. Failure to comply gives the applicant a right of action in the County Court or High Court. It is therefore essential that all applications be processed as a matter of priority, thereby minimising risk to the organisation.

## 6.10. **Charging for Subject Access**

- 6.10.1. NHS CCG will not charge for access to records. However, the Data

Protection Act 2018 describes a 'reasonable fee' if the request is 'manifestly unfounded or excessive'. This term is subjective and based on NHS CCG's interpretation. Any decisions to charge for access to records should be justified in doing so.

- 6.10.2. Where an individual makes a repeated request for the same information a charge can be considered or the request refused.
- 6.10.3. Where a request requires NHS CCG to create a medical report or interpret information in a medical record or report, this would place it under the Access to Medical Reports Act. In such circumstances a fee can be charged. This is not something that would be included under a Subject Access Request as this is not existing information held.

#### **6.11. Mistakes or Inaccuracies**

- 6.11.1. If the applicant considers that there are mistakes or inaccuracies in the record they can ask the record holder for a note to be made in the records stating their opinion. If the practitioner agrees that the information is inaccurate, he / she should make the correction. Care must be taken not to simply obliterate information, which may have significance for the future care and treatment of the patient, or for litigation purposes.
- 6.11.2. If he /she does not agree, a note recording why the applicant considers the information to be inaccurate must be made in the relevant part of the record. Consideration should also be given to whether it is appropriate to note any associated records, e.g. computer records.
- 6.11.3. It should be understood that in Law nothing may be erased from a paper health record but a correction may be added.
- 6.11.4. A copy of any correction or note should be supplied to the patient. No fee may be charged for this.

#### **6.12. Complaints Concerning Application**

- 6.12.1. If the applicant feels that they have not been fairly treated and that the holder of the record has not complied with the Act, then they should first complain in writing to NHS CCG.
- 6.12.2. If they are still unhappy after this, the applicant has the right to apply to the Information Commissioner to review the outcome of the application if necessary. To complain to the Information Commissioner, please see the ICO web page at: <https://ico.org.uk/make-a-complaint/>

#### **6.13. Additional Information**

- 6.13.1. Requests for access to information may be made in some circumstances under the Freedom of Information Act 2000. Please see the Freedom of Information section of our website to make a request for corporate

information.

#### **6.14. Requests for Personal Data - the Freedom of Information Act and Data Protection Act**

- 6.14.1. The Personal Data Exemption in the Freedom of Information Act 2000 falls under Section 40. Section 40 provides an exemption from the right to know principle where the information requested by an applicant consists of personal data.
- 6.14.2. Regarding access to information relating to deceased persons, it is important to note that the definition of 'personal data' in Section 40 is restricted to information relating to living individuals. Information, which relates solely to a deceased person, is not covered by this exemption. Section 40 will only apply if the information relating to the deceased person is also the personal data of a living individual. For example, genetic information about a deceased person may also be the personal data of that person's ancestors and descendants. If the information requested relates solely to a deceased person, the information is potentially disclosable under the Freedom of Information Act.
- 6.14.3. However, other exemptions in the Freedom of Information Act may be applicable to personal information relating to deceased persons and may justify a refusal to disclose under the Act. For example; Section 21, which exempts information readily accessible to the applicant by other means - section 3 of the Access to Health Records Act 1990 allows a deceased patient's personal representative or anybody who may have a claim arising out of the death to access the patient's health records; Section 38, which exempts information whose disclosure would or would be likely to endanger the physical or mental health or the safety of any individual (for example by means of shock or distress); Section 41, which exempts information obtained by a public authority from another person if the disclosure of this information to the public would constitute a breach of confidence actionable by that or another person; Section 44, which exempts information where disclosure is prohibited by or under any enactment, including the Access to Health Records Act 1990 and the Human Rights Act 1998. If disclosure of information relating to a deceased person would breach the right to a private and family life of a living person (as protected by Article 8 of the European Convention on Human Rights), it will be exempt under Section 44 because it would breach section 6 of the Human Rights Act.

#### **6.15 The Application of the Section 40 Exemption (Freedom of Information Act) to Information Relating to Living Individuals**

- 6.15.1. If the personal data requested relates to the applicant, then the request should be treated as a Subject Access Request under the Data Protection Act 2018, as usual. This would also cover the situation whereby the request is made by a Solicitor on behalf of his client, a parent on behalf of a child, a person appointed by the Court on behalf of a person who lacks capacity etc, because these are all still subject access requests i.e. requests made by a

person with authority to make the request on the data subject's behalf.

6.15.2. The Information Commissioner Guidance says that, whilst such a request is to be treated as a request under the Data Protection Act, you should inform the applicant if you will be unable to respond within the Freedom of Information Act 20 working day period and require the one calendar month period allowed under the Data Protection Act instead. The Department of Health has stipulated that the NHS should endeavor to comply with subject access requests within 21 days, rather than the allowed one calendar month - this is not legislation, just guidance. Access to Health Records will aspire to comply within the 21-day or, at least, the applicant should be informed that the request will be dealt with (within one calendar month) under the Data Protection Act.

#### **6.16 If the Information Requested Relates to a Third Party**

6.16.1. If the personal data requested is about somebody other than the applicant (the above exceptions of solicitor, parent, etc aside), the exemption under the Freedom of Information Act will only apply if disclosure would breach any of the Data Protection Principles. So, the usual data protection rules apply as to when it would be justifiable to disclose without consent and when it would not be - if disclosure would breach the usual data protection rules, disclosure need not take place. However, if disclosure is justified in accordance with the usual Data Protection rules, it can take place and timescale under the Freedom of Information Act should apply. Whilst the following does not directly apply to medical records, it is interesting to note that the Information Commissioner's Guidance states that information relating to somebody acting in an official or work capacity should normally be provided on request, unless there is a risk to the individual concerned – 'the exemption from disclosure should not be used as a means of sparing officials embarrassment over poor administrative decisions.'

6.16.2. Under the Access to Medical Reports Act, individuals can apply to access medical reports prepared for employment or insurance purposes.

6.16.3. The Secretary of State may make further orders to exclude other types of data if this is necessary to safeguard the interests of Patients or the Rights and Freedoms of others.

6.16.4. In most cases access under the Act will be straightforward. However, there will be instances where a detailed knowledge of the Act and its implications are vital.

6.16.5. The Information Commissioners websites provide some useful information: <http://www.ico.gov.uk/>

6.16.6. Any further advice should be directed to the Solicitors acting for NHS CCG, for which permission from a Senior Officer must be first agreed.

## 6.17. Subject Access Request Definitions

6.17.1. There are certain definitions given in the Act. These are:

- An **application** means an application in writing (see Process of Administration below).
- A **health record** is defined as information relating to the physical and / or mental health of an individual who can be identified from that information and which has been made by, or on behalf of a Healthcare Professional, in connection with the care of that individual.
- The **holder** of the record is NHS CCG by which, or on whose behalf, the record is held.
- The **patient** is the individual in connection with whose care the record has been made.
- The **Healthcare Professional** can be one or more registered health professionals.

## 7. How do I request information about me?

7.1. There are certain procedures that must be observed when applying to see records under the Act. It may seem a rather complicated process but it is of vital importance to make sure that the records are released only to the right person, because the confidentiality of records calls for the greatest safeguards.

7.2. Requests for information held about an individual by NHS CCG should be made in writing either by post or email and be sent to the appropriate address or email address as detailed below:

Email: [cheshireccg.sar@nhs.net](mailto:cheshireccg.sar@nhs.net)

Post: Subject Access Requests, 1<sup>st</sup> Floor – West Wing, New Alderley Building, Macclesfield District General Hospital, Victoria Road, Macclesfield, SK10 3BL

7.3. NHS CCG will manage the request in line with the Subject Access Request policy.

## 8. Monitoring

8.1 Compliance with this Policy will be monitored via NHS CCG's SIRO, Caldicott Guardian, and the Information Governance Senior Manager, together with independent reviews by both Internal and External Audit on a periodic basis.

8.2 The Information Governance Senior Manager is responsible for the monitoring, revision and updating of this Policy on a 2 yearly basis or sooner if the need arises.

8.3 This Policy will be made available to all Staff via NHS CCG's website.

## **9. Equality Impact Assessment**

9.1 This Policy forms part of NHS CCG's commitment to create a positive culture of respect for all staff and service users. The intention is to identify, remove or minimise discriminatory practice in relation to the protected characteristics (race, disability, gender, sexual orientation, age, religious or other belief, marriage and civil partnership, gender reassignment and pregnancy and maternity), as well as to promote positive practice and value the diversity of all individuals and communities.

9.2 As part of its development this Policy and its impact on equality has been analysed and no detriment identified.

## **10. Associated Documents**

10.1 The following documents will provide additional information:

- Information Governance Strategy
- Information Governance Policy
- Confidentiality and Data Security Policy
- Freedom of Information Policy
- Corporate Records Management and Retention Policy
- The suite of ICT security policies.