

## Subject Access Request Procedure

SELDOC does not usually process subject access requests. The patient (data subject) is referred to their practice that holds their complete health record. SELDOC patient records are electronically transferred to each patient's practice automatically using the clinical system Adastra. The only exception to this is when the patient is not registered with a LSL practice and the patient record is sent by fax to the patients' registered GP practice. SELDOC are unable to forward a patient's medical record to a GP, if a patient is unregistered or has not provided SELDOC with details of their GP.

The following procedure should only be followed when the information is not available from the patient's general practice:

1. The subject access request is received and assigned to the Patient Liaison & Quality Coordinator (PLAQ).
2. The subject access request must be made in writing, be clear and provide enough information for SELDOC to be able to process the request.
3. The PLAQ will acknowledge the request to the patient (data subject) and confirm the subject access request and the associated payment.
4. SELDOC charges a fee of minimum of £10 for electronic records and maximum of £50 for hand written records; this is in line with the Data Protection Act 1998.
5. The subject access request must be dealt with as soon as practically possible and within **40 calendar days**.
6. Day One starts on receipt of the fee and sufficient information to identify the person making the request and to locate the information requested.
7. The PLAQ will search all possible records – including Adastra and any paper records - for the requested information.
8. The information must be checked by the Caldicott Guardian to:
  - Identify any information which must not be disclosed as it would cause physical or mental distress to the data subject
  - Protect the identity of any third parties
  - Ensure consent from third parties is obtained before disclosure
  - Explain any unintelligible terms
  - Ensure that records clearly show the origin of the record
9. Any actions identified in 8. must be actioned and documented.
10. The PLAQ will photocopy all the information twice:
  1. One copy for the data subject
  2. One copy for SELDOC (a record of information that has been disclosed)
11. All the information collected for the data subject is filed within the appropriate filing system (e.g. complaints, special allocation service etc).
12. The PLAQ will send all the relevant information by special delivery (requires a signature).

Agreed by the Medical Director, SELDOC

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