

Recording Subject Access Requests (SARs)

The UK General Data Protection Regulation (UK GDPR), implemented in the UK through the Data Protection Act 2018, gives your patients access rights to their personal data from any health and care organisation that holds records on them, a Subject Access Request (SAR) is the formal procedure of applying for information.

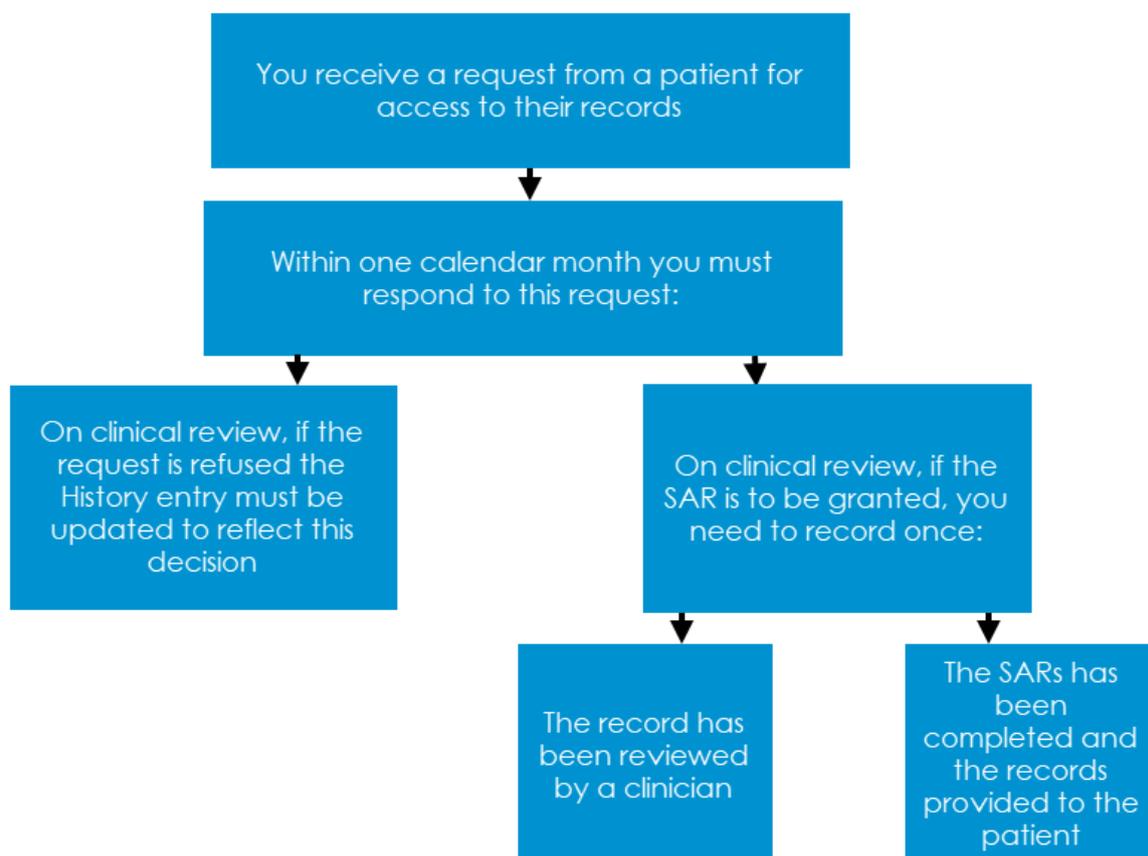
You may receive SARs from:

- Competent patients.
- Third-parties that are authorised by a competent patient.
- Children or young persons over 12 years of age that are considered the capacity to consent.
- Parents of children or young persons as long as it is not in contradiction to the wishes of the competent child.

This quick reference guide is designed to assist you in the recording of SARs from your patients:

SARs Overview

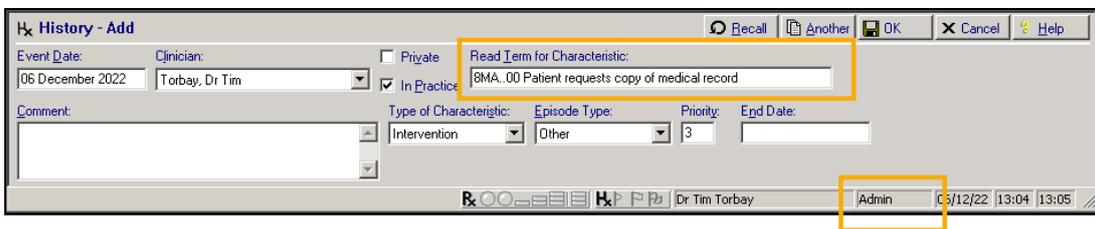
The following diagram demonstrates the actions that must take place when you receive a SARs:



What should we do when a request is received?

When you receive a request from a patient for a copy of their medical record, you must action and respond to the request within one calendar month of receiving the request. To record the request, we strongly recommend the following:

1. From **Consultation Manager**, select the appropriate patient and open an **Administration** consultation.
2. In **Read Term - Add**, enter #8MA and press **Return** on your keyboard twice.
3. The **History - Add** screen displays, in **Comment** enter any additional information regarding the request if required:



4. Select **OK** to save.

If the request is to be refused...

A SAR request can be refused, under the Data Protection Act 2018 where:

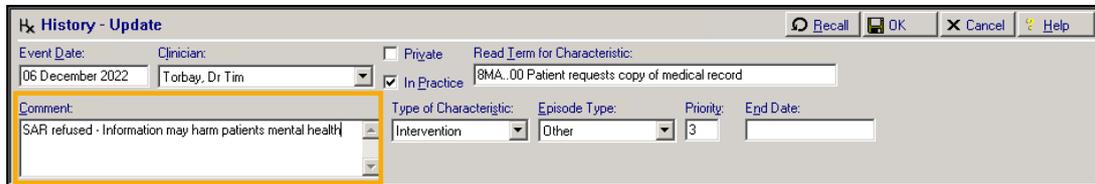
- The information released is likely to cause serious physical or mental harm to the individual or another person.
- The record contains information relating to a third party.

In addition, you do not have to provide a person with a copy of their health and care records if you believe their subject access request is 'manifestly unfounded or excessive'. Should you choose to respond you may charge a reasonable fee for doing so. SARs that fall into this category are likely to be repetitive, for example, regular requests for copies of records especially where there has been little or no change to the record since the previous request, aimed at disrupting your organisation or targeted against an individual. Decisions about whether a SAR falls into this category must be taken on a case-by-case basis and you should be able to justify your decision with evidence.

(Reference - https://transform.england.nhs.uk/information-governance/guidance/subject-access-requests/#healthcare_worker)

To record a request has been refused:

1. From **Consultation Manager**, locate the request record.
2. Right click on the record and select **Edit**.
3. Enter 'SAR refused' and the reason why in **Comment**:



4. Select **OK** to save.

If the request is to be granted...

If a SAR is to be granted, you need to record once:

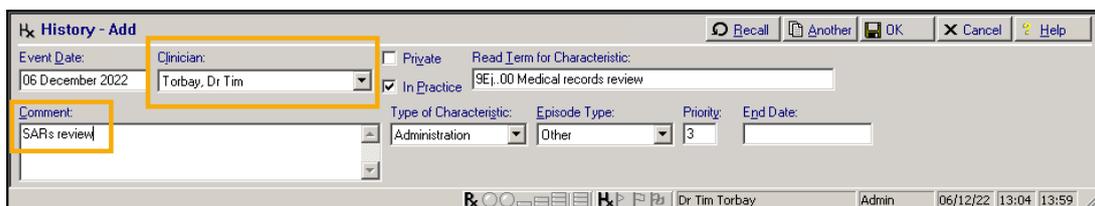
- The records have been reviewed by a clinician, see [Recording Records are Reviewed](#) on page 3 for details.
- The SAR has been completed and the records provided to the patient, see [Recording SARs is Complete](#) on page 4 for details.

Recording Records are Reviewed

SARs should be reviewed by an appropriate healthcare professional, to ensure the information being provided does not have the potential to cause serious harm to the mental or physical health of the patient or any other person.

To record that the records have been reviewed:

1. From **Consultation Manager**, select the appropriate patient and open an **Administration** consultation.
2. In **Read Term - Add**, enter '#9Ej' and press **Return** on your keyboard twice.
3. The **History - Add** screen displays. Select the appropriate **Clinician** and enter 'SARs review' in **Comment**:

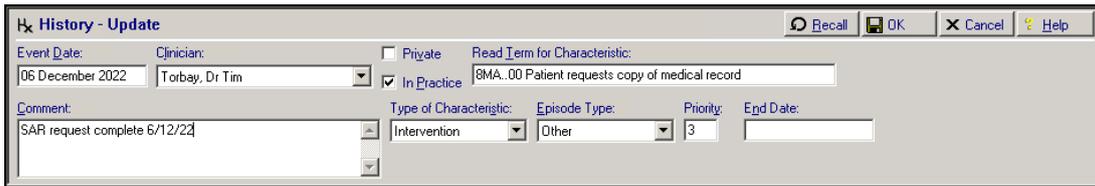


4. Update **Priority** if your practice protocols require it.
5. Select **OK** to save.

Recording SAR is Complete

Once you have complied with the request, as per your practice protocol, you need to record that the process is complete. To record the request is complete:

1. From **Consultation Manager**, select the appropriate patient.
2. Locate the original request, right click on it and select **Edit**.
3. The **History - Update** screen displays, enter 'SAR request completed nn/nn/nn' (where nn/nn/nn is the date) in **Comment**:



4. Select **OK** to save.

Fulfilling a Subject Access Request

Printing a full patient record is done in two parts:

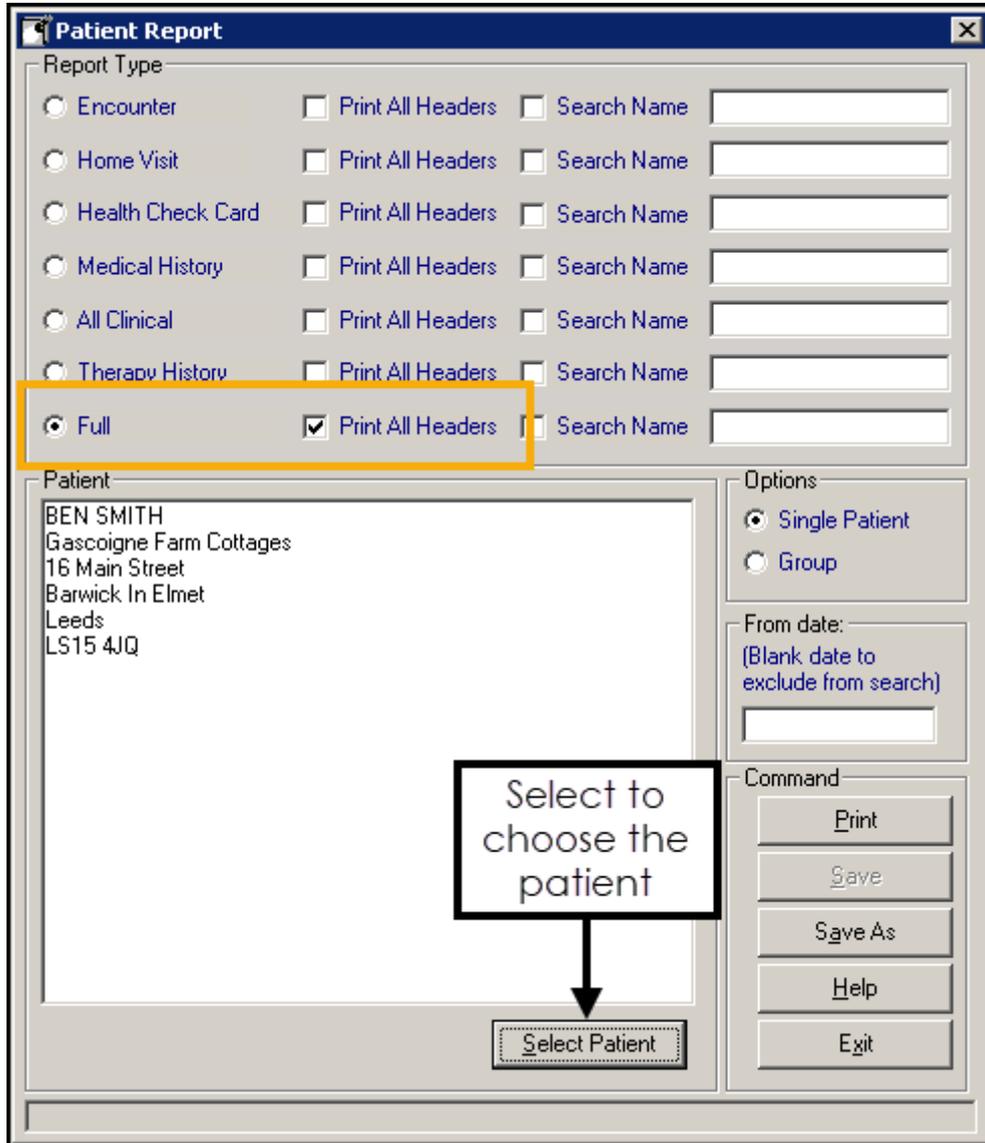
- Using the **Full Report** or the **Smart Tag** report from Consultation Manager, see [Printing a Full Record](#) on page 5 or [Using the Smart Tag Report from Consultation Manager](#) on page 6 for details.
- From the **Clinical Document Viewer**, see [Printing Multiple Clinical Documents](#) on page 7 for details.

 **Important** - You should review any documents before handing/sending them to the patient as you may want to redact any references to third parties, for example, next of kin or carers.

Printing a Full Record

To print the full patient record report:

1. From the **Vision 3** front screen, select **Reporting - Search and Reports**.
2. Select **New Patient Report**  and the **Patient Report** screen displays:



Patient Report

Report Type

Encounter Print All Headers Search Name
 Home Visit Print All Headers Search Name
 Health Check Card Print All Headers Search Name
 Medical History Print All Headers Search Name
 All Clinical Print All Headers Search Name
 Therapy History Print All Headers Search Name
 Full **Print All Headers** Search Name

Patient

BEN SMITH
 Gascoigne Farm Cottages
 16 Main Street
 Barwick In Elmet
 Leeds
 LS15 4JQ

Options

Single Patient
 Group

From date:
 (Blank date to exclude from search)

Command

Select to choose the patient

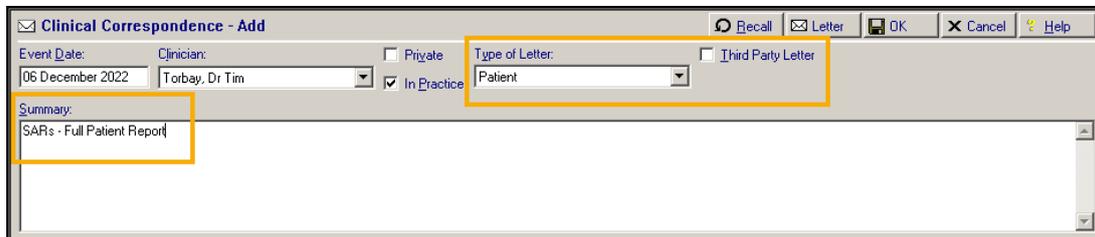
3. Complete as required:
 - **Report Type** - Select **Full**, and tick **Print All Headers** for a clearer result.
 - **Select Patient** - Select to choose the patient you require the report for in the usual way.
4. Select **Print**.

5. Select the method of output you require:
 - **Window** - To view the output before printing.
 - **Printer** - Select the correct printer and send the report straight to a printer.
 - **File** - To save the result to your computer.

Using the Smart Tag Report from Consultation Manager

To use the predefined **Smart Tag** report:

1. From **Consultation Manager**, select the appropriate patient and open an **Administration** consultation.
2. Select **Add - Correspondence** and the **Clinical Correspondence - Add** screen displays:



Complete as follows:

- **Event Date** - Defaults to consultation date, update as required.
- **Clinician** - Defaults to clinician logged on or Usual GP, update as required.
- **Private** - Leave unticked.
- **In Practice** - Ticked by default.
- **Type of Letter** - Select **Patient**.
- **Third Party Letter** - Remove tick.
- **Summary** - Enter details as required, for example, 'SAR's - Full Patient Report'.

3. Select **Letter** .
4. The **Select Patient Template to Open** screen displays, select **Full Patient Record.doc** and select **Open**.
5. Review the report that displays and redact any third party information as appropriate, for example the names of next of kin or carers.
6. Select **Print** .
7. Now close the report. It automatically saves to **Vision 3** and **Letter** displays with a red tick .
8. Select **OK** to save.

Printing Multiple Clinical Documents

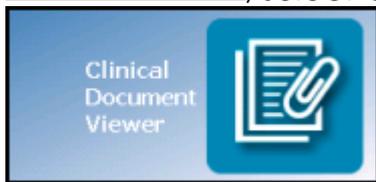
The **Clinical Document Viewer** allows access to all patient attachments, including those held in Docman, from a single location. This enables you to view and print one or more attachments for a selected patient.

To print multiple clinical documents:

1. From either **Consultation Manager - Apps** or **Apps Controller**



, select **Clinical Document Viewer**



2. Select the patient required in the usual way.
3. The **Clinical Document Viewer** screen displays, highlight an item to display a preview on the right hand side if one is available.



Remember - To change the order the documents display in, select the appropriate column header.

4. Select the items you want to print by either:
 - Ticking the individual items, or
 - Right clicking and selecting **Select All**.
6. Now select either:
 - **Print selected documents** - The '*Printing Page n of Document*' message displays during the printing process, or
 - **Save selected documents - Browse for Folder** displays, select where you want to save the file and then **OK**. If you use **Vision 3** through a managed server, remember to save it to a local drive.



See [Giving patients access to medical reports](#) and [Requests for medical information from insurers](#) on the BMA website for further advice.
