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| Job Title: | Subject Access Rights Officer |
| Reports to (job title): | Senior Subject Access Officer |
| Line Manager to: | None |

Job purpose

The post holder will be part of a well-established national Information Governance team and will have day to day responsibility for the management of all types of access to records requests.

The role of the Subject Access Officer is to act as the key point of contact for all Subject Access and other access to health and care requests and ensure they are processed in a timely, accurate and compliant manner using our privacy management system and DSAR portal.

Base

Local office dependent on location. Remote working is supported, and occasional travel is expected to sites within the allocated areas and beyond as required.

Key responsibilities

- Act as a key point of contact for access to records enquiries, providing a complete, confidential, and friendly service to key internal and external stakeholders while adhering to The Data Protection Act 2018 and UK General Data Protection Regulation (GDPR), Access to Health Records Act 1990, Court Orders, Police requests and other ad hoc requests.
- To coordinate with the Data Subject Rights Manager in the management of other requests under Data Subject Access Rights e.g. requests to alter records, restrict data etc.
- Responsible for the timely acknowledgment, logging, and actioning of incoming requests on our DSAR portal, ensuring responses are provided within statutory timescales.
- Ensure assessments for complexity is made at the earliest of stages and communicate promptly with applicants if the timescale is to be extended.
- Support colleagues across the organisation with advice, compliance and support relating to access to records requests.
- Work collaboratively with key stakeholders, such as Safeguarding Teams, clinical systems team and other relevant internal and external stakeholders to pro-actively manage and respond to requests within a timely manner. Ensure all actions, decision-making and exemptions are recorded.
- Where relevant, lead on the collation, review and preparation of the disclosures and facilitate a final review by healthcare practitioners providing expert advice on the correct application of exemptions.

- Support the Data Subject Rights Manager in the maintenance of monthly KPIs and compliance figures relating to access to health and care records requests.
- Promptly escalate any risk of non-compliance, incidents, complaints, or Information Commissioner’s Office correspondence to the Records Manager/Data Protection Officer.
- Work with the central IG team to review and develop policies and procedures and the ongoing management of the DSAR portal to ensure that the best customer service can be provided.
- Assist with any communications or training on Access to Records Requests.
- Attend and contribute to the Access to Records Team meetings and training.
- Participate in the formulation of detailed team objectives and action plans relating to the management of access to records including the ongoing centralisation. Jointly manage the achievement of these objectives and action plans by monitoring through team meetings, monthly performance reports, and maintenance of the incident reporting system.
- The post holder will work as part of the Subject Access Officer team and provide reciprocal cover for other Subject Access Officer absences where needed.

Our values

Our values are our moral compass and core to our DNA. They underpin the way we deliver our services and treat those who use our services.

To many organisations values are just words which don’t translate into reality of the day to day but our values flow through everything that we do, they define who we are, what we stand for and set the expectations of our colleagues, communities, customers and partners. They have been defined by our colleagues and have been integral to our journey so far and will be integral to our future as well.

We have three values which help us stand out from the crowd, not just because there’s only three, but because they are unique to who we are. We care, we think, and we do.

| Care Think Do | who we are. We care, we | think, and we do. |
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| <ul style="list-style-type: none"> •Inspire • Challenge • •Understand • Improve • •Communicate • Learn • | <ul style="list-style-type: none"> Accountability Involve Resilience | |

Confidentiality and Information Security

As our employee you will be required to uphold the confidentiality of all records held by the company, whether patients/service records or corporate information. This duty lasts indefinitely and will continue after you leave the company’s employment.

All information which identifies living individuals in whatever form (paper/pictures, electronic data/images or voice) is covered by the 2018 Data Protection Act and should be managed in accordance with this legislation. This and all other information must be held in line with NHS national standards including the Records Management: NHS Code of Practice , NHS Constitution and HSCIC Code of Practice on Confidential Information and should only be accessed or disclosed lawfully. Monitoring of compliance will be undertaken by the Company. Failure to adhere to Information Governance policies and procedures may result in disciplinary action and, where applicable, criminal prosecution.

Information governance responsibilities

You are responsible for the following key aspects of Information Governance (not an exhaustive list):

- Completion of annual information governance training
- Reading applicable policies and procedures
- Understanding key responsibilities outlined in the Information Governance acceptable usage policies and procedures including NHS mandated encryption requirements
- Ensuring the security and confidentiality of all records and personal information assets
- Maintaining timely and accurate record keeping and where appropriate, in accordance with professional guidelines
- Only using email accounts authorised by us. These should be used in accordance with the Sending and Transferring Information Securely Procedures and Acceptable Use Policies.
- Reporting information governance incidents and near misses on CIRIS or to the appropriate person e.g. line manager, Head of Information Governance, Information Security Lead
- Adherence to the clear desk/screen policy
- Only using approved equipment for conducting business

Governance

Clinical governance is a framework through which organisations delivering health and care services are accountable to continuously improving the quality of their services and safeguarding high standards of care by creating an environment in which clinical and other forms of care flourishes. Employees must be aware that clinical governance places a duty on all staff to ensure that the level of care services they deliver to patients is safe and high quality, and that they follow/comply with our policies and procedures.

Registered Health Professional

All staff who are a member of a professional body must comply with standards of professional practice/conduct. It is the post holder's responsibility to ensure they are both familiar with and adhere to these requirements.

Risk Management/Health & Safety

The post holder has a responsibility to themselves and others in relation to managing risk, health and safety and will be required to work within the policies and procedures laid down by the company. Staff are required to observe the Hygiene Code and demonstrate good infection control and hand hygiene.

Employees must be aware of the responsibilities placed on them by the Health & Safety at Work Act (1974) to ensure that the agreed safety procedures are carried out to maintain a safe environment for other employees, patients and visitors. It is essential to observe strict fire and security precautions at all times.

All staff must report accidents, incidents and near misses so that the company can learn from them and improve safety.

Safeguarding Children and Vulnerable Adults Responsibility

We are committed to safeguarding and promoting the welfare of children and adults at risk of harm and expects all employees to share this commitment.

Medicines Management Responsibility

Nursing or registered healthcare professionals

Undertake all aspects of medicines management related activities in accordance within the company's medicines policies to ensure the safe, legal and appropriate use of medicines.

Skilled non-registered staff

Undertake all aspects of medicines management related activities in accordance with the company's medicines policy where appropriate training has been given and competencies have been achieved.

Policies and Procedures

All colleagues must comply with the Company Policies and Procedures which can be found on the company intranet.

General

We are committed to serving our community. We aim to make our services exemplary in both clinical and operational aspects. We will show leadership in identifying healthcare needs to which we can respond and in determining the most cost-effective way of doing so.

We recruit competent staff that we support in maintaining and extending their skills in accordance with the needs of the people we serve. We will recognise the commitment from our staff to meeting the needs of our patients.

The company recognises a “non-smoking” policy. Employees are not able to smoke anywhere within the premises or when outside on official business.

Equal Opportunities

It is the company’s intention to be an employer of choice and ensure that no job applicants or employees are unfairly disadvantaged on the grounds of gender, disability, race, ethnic origin, colour, age, sexual orientation, religion or belief, trade union membership or any other factors that are not relevant to their capability or potential. To this end, the company has an Equality and Diversity policy, and it is the responsibility of each employee to contribute to its success.

Flexibility Statement

This job description is not exhaustive and may change as the post develops or changes to align with service needs. Any such changes will be discussed directly between the post holder and their line manager.

Personal Specification

Essential

- Extensive experience with all Microsoft Office applications and Adobe.
- Awareness and understanding of data protection laws and the management of Subject Access requests.
- Possess excellent English reading and writing skills and communication skills, both verbally and in writing and able to communicate effectively with internal and external stakeholders.
- Excellent attention to detail
- Possess excellent organisation and time management skills; comfortable working in high pressure environments and meeting tight deadlines whilst demonstrating a positive attitude and high standards of professionalism.
- Possess excellent administrative skills in supporting and managing high volumes of requests and queries.
- Possess excellent customer service skills and be able to deal confidently and confidentially with all aspects of interaction from service users, members of the public and other external stakeholders.

Desirable

- Knowledge or experience of using health and care systems e.g. SystemOne, EMIS.
- Medical records experience.



Job Description

Employee signature

Manager signature

care·think·do

WE CHANGE LIVES BY TRANSFORMING HEALTH AND CARE

HCRG Care Ltd, company number 5466033 registered in England and Wales at The Heath Business and Technical Park, Runcorn, Cheshire WA7 4QX