

Reference: FOI 37604 GLO 11M

Subject: Patient Records Audit Trail

I can confirm that the CCG does hold the information requested; please see responses below:

QUESTION	RESPONSE
<p>My question concerns requests for an audit trail of who has accessed a patients computerised medical records but not necessarily made an entry. Patient can easily obtain a print out of their medical records but this will not show a record of people who have viewed them but not written in them.</p> <p>it is my understanding from the Caldicott 2 report, “To Share or not to Share – the Clinical Governance Review https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/192572/2900774_InfoGovernance_accv2.pdf and the UK Gov response to this report: “Information: to Share or not to Share. UK Governments response to the Caldicott Review” https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/251750/9731-2901141-TSO-Caldicott-Government_Response_ACCESSIBLE.PDF</p> <p>that if a patient, or the relative of a deceased patient, of an NHS hospital, requests an audit trail then one will be provided unless there are medical reason why this might not be in the patients best interests.</p>	
<p>1. I am looking for confirmation of this practice and where that is stated as a policy of the NHS that a patient can refer to if they meet with a reluctance to supply this information.</p>	<p>Under GDPR everyone has the right to access information that an organisation holds about them, data including who has accessed that information.</p> <p>Gloucestershire CCG operates a subject access request process for this purpose. If the requestor is unhappy with the response they have option of asking the organisation to reconsider their response and seek local resolution.</p> <p>If they have done this and remain dissatisfied, they have the opportunity to refer their complaint to the Information Commissioners Office: https://ico.org.uk/make-a-complaint/your-personal-information-concerns/</p>

The information provided in this response is accurate as of 6 January 2021 and has been authorised for release by Ellen Rule, Director of Transformation & Service Redesign for NHS Gloucestershire CCG.