**ACCESS TO RECORDS PRACTICE GUIDANCE**

This guidance should be read in conjunction with PCC's procedural guidance for access to records (2.3) [Access to Records / Subject Access Requests](https://portsmouthchildcare.proceduresonline.com/p_access_to_recs.html)  and the confidentiality policy (2.4) [Confidentiality Policy](https://portsmouthchildcare.proceduresonline.com/p_confid_pol.html) within the Portsmouth childcare procedures online on Tri-ex. The online policies give more detail on the data protection legislation. This document is supplementary to help facilitate a pathway that is both supportive of the request of the data subject and their needs and being compliant by providing some frequently asked questions.

The use of the term 'data subject' is a legal definition however inherent within our approach is a recognition that the 'data subject' is a child or an adult who is a person.

Similarly, the use of the term 'data' is a legal term but it is recognised that this refers to the paper and electronic records or files of children or of adults when they were children so this can be deeply personal information.

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16. **Introduction**

Under the subject access provisions in Article 15 of the General Data Protection Regulations (GDPR), individuals can request access to as much of their personal information as an organisation holds about them. Unless a legal exemption applies (see section 8), the request must be complied with, but this is often difficult in the case of children and families' records, as they usually contain information relating to more than one individual, and decisions regarding disclosure must often be made on an individual basis.

The rights of all individuals must be considered when preparing records for access and this can often lead to several questions regarding whether information can be disclosed or not.

The law does provide for the concept of 'reasonableness' for professionals such as social workers in disclosing information to a data subject without the consent of the other individual.

This is a link to the ICO guidance [What should we do if the request involves information about other individuals? | ICO](https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/individual-rights/right-of-access/information-about-other-individuals/#:~:text=You%20need%20to%20weigh%20the,the%20third%20party%20withholds%20consent.)

***Why may a Subject Access Request (SAR) be important?***

Individuals can make a SAR verbally or in writing.

Article 15 of the GDPR, gives individuals the right to obtain a copy of their personal data as well as the purposes of the processing, who the data has been shared with and how long it will be kept. They are however only entitled to their own personal data and not generally to information relating to other people

Data protection legislation is supposed to be an enabling framework allowing people to have access to personal information and should not be misunderstood and applied as a barrier to them receiving information.

The Children Act Guidance and Regulations Volume 2, 7.6 (July 2021) [The Children Act 1989 guidance and regulations](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1000549/The_Children_Act_1989_guidance_and_regulations_Volume_2_care_planning__placement_and_case_review.pdf)

*"The responsible authority’s records are an important source of information for the child who is looked after away from his/her family. They provide information about the sequence of events and the reasons why important decisions in the child’s life were made. For some children they will provide a means to trace relatives with whom they may have lost contact, such as brothers and sisters."*

Previous iterations of the guidance have noted it is important that people who have spent time in care receive *comprehensive information about their family background and time in care to enable them to make informed decisions about their lives.*

For someone accessing their records (particularly if they have been looked after 'in care') *knowing where we come from and what has happened in our past is an important part of making sense of ourselves and our lives.* Often in making sense of their history, unlike for most children, they do not have a 'collective family memory' and therefore there are gaps in information or confusion about their history. Care experienced children and adults may want to know why they came into care, about the placements they had and the carers who looked after them as their memories may be vague. They will have questions which they want answers to, and the SAR may be a part of that search.

'A *consistent thread experienced by many care leavers is trying to make sense of past experiences which profoundly impact on their emotional well-being*' [It’s my journey, it’s my life, it’s my identity! report](https://www.accesstocarerecords.org.uk/its-my-journey-its-my-life/) and that it is difficult for these adults to move forward building their lives resiliently if their past is unresolved.

Coram-BAAF similarly offer advice about the need to help workers make *'empathic and constructive decisions about information sharing to enable adult care leavers to have sufficient information about their family, their background, and their time in care to help them have an understanding of their past and decisions made while they were in care and how this may have affected their journey throughout their childhood and into adulthood'.*

It is recognised that the redaction of minutes is not an ‘exact science’, and that professional judgement will need to be exercised as it can be a finely balanced decision to retain or remove information.

The Departmental guidance (Tri-Ex - Section 4) on access to records also confirms that in terms of information supplied by third parties; *where it is not possible to obtain consent, discretion may be used to release information where there is no possibility of serious harm, or it would be considered reasonable to disclose the information without the consent of the other individual.*

1. **Offering an informal approach**

Information should be routinely shared with a child as part of normal working practice.

If a person, currently in receipt of services asks to see a particular document or to have information about a particular aspect of their mosaic (or any other) record their worker can provide this information without the need for a subject access request unless there is a valid exemption, for example, if disclosure would be likely to prejudice carrying out social work because it would be likely to cause serious harm to the physical or mental health of any individual

It is suggested that this approach is also extended to those not currently in receipt of services who approach the department searching for information.

It is legitimate to confirm the scope of the request i.e. you can clarify with the requestor if the request is too wide ranging or vague and carry out checks to verify the requester's identity.

This approach might be timelier for the person as there may be delays with subject access requests.

If the person is clear that they wish to have a subject access request for their whole file, then this should be facilitated through the correct team and **barriers should not be put in the way,** but this can be explored with them to understand what information they want and the best way to achieve that.

1. **Information relating to the data subject's family members**

***Should full names and dates of birth of parents and siblings be disclosed to the data subject*?**

Relatives of the data subject are classed as third parties under the GDPR. The Act states that where the data controller is unable to comply with the request without disclosing information relating to another individual who can be identified by the information, he is not obliged to comply with the request unless

* consent has been given by the third party, or
* it is reasonable to comply without the consent of the third party

Government guidance recognises that records may be a way for some children to trace lost relatives such as brothers or sister. Information such as names and dates of birth clearly identify individuals and the decision as to whether the full names of parents and siblings can be disclosed should take into consideration the age of the file and whether it is likely that the data subject already knows this information.

In the case of sibling names, if it is clear from the file that the siblings were aware of each other then it seems reasonable to disclose their names.

Decisions regarding sibling names is more likely to become difficult when it is clear the data subject was not aware of the sibling, or where they may have been separated in early life and disclosure of their full name may enable the data subject to trace them.

Article 8 of the Human Rights Act is relevant here, as this refers to the right of everyone to respect for private and family life. This right applies to both the data subject and their family members, and it is therefore necessary to balance the rights of all individuals when discussing whether to disclose this information.

With regards to the data subject, the right to family life should give them the right to be told of the existence of siblings they may have previously been unaware of, and to be told their names. The siblings also have the right to private lives however, and as they may not want to be traced it may be necessary to withhold their names. This right should be balanced with the data subject's right to family life.

Decisions should be made on a person/child by person/child basis, taking into account the rights of all parties and any decision and the reasons for it should be recorded.

With regards to parents' names, it is likely that the right of the data subject to family life would outweigh the right of the parents to private life and it would seem reasonable to disclose names of parents.

Disclosure of dates of birth of both parents and siblings would perhaps not all come under the right of the data subject to family life, and these would not normally be disclosed.

With regard to other family members, decisions on disclosure of names should be made with the above points in mind. Again, dates of birth would not normally be disclosed.

It is important to remember to record reasons for decisions in case notes.

Any records found in a file relating to adoption must be referred to the Adoption Manager for clarification and must not be disclosed without permission.

1. **Sensitive information regarding parents, relating to reasons the data subject came into care**

***If there are medical reasons relating to the parent which meant the data subject had to be received into care, or if the parent had a criminal record relevant to reasons for reception into care, can this information be shared with the data subject?***

e.g., If the data subject was received into care because mother was hospitalised due to a hysterectomy, can this be disclosed to the data subject?

Information regarding a third party's physical or mental health, or criminal record is sensitive personal data and the consent of the third party should be sought to disclose this information.

It is necessary to check with the data subject prior to seeking consent of third parties, as the data subject may not want the third party to be made aware of their request for access to their records. If this is the case, or it is not possible to locate the third party, the data controller must judge whether the information can be disclosed without consent.

Decisions should take into account the relevance of the information to the data subject and their understanding of their history. The example above relating to mother's hospitalisation would explain to the data subject why they were received into care and is therefore important information for their understanding of their history. If possible, the reason for hospitalisation could be removed, but the fact that hospitalisation was the reason for reception into care could be disclosed. It is important to consider the sensitivity of the information and the effect disclosure may have on the third party, when deciding whether to disclose information of this nature.

1. **Information relating to foster carers**

***Can names and addresses of foster carers be disclosed to the data subject?***

It is quite likely that if the data subject was in the care of the same foster carers for some time, they will remember their names and possibly their address as well. Although names are identifying information, foster carers have a professional role in relation to the data subject and it may therefore be reasonable to disclose their name to the data subject.

The data subject may remember the address of the foster carers, in which case it would not be necessary to disclose the address. If they do not know, or if it is unclear whether they know the address, the balance is likely to be in favour of the foster carers right to private life, and the address would not normally be disclosed.

It is important to bear in mind the reasons why the data subject may wish to know the address, and the nature of the relationship between the data subject and foster carer. It is possible that the data subject left the placement on bad terms, in which case it may not be advisable to disclose the address. On the other hand, it may be that the data subject would like to renew contact with the foster carers. It is perhaps safest to withhold the address and if the data subject wishes to renew contact, the data controller could make contact with the foster carer on their behalf.

Although it is perhaps not advisable to share the address of the foster carers, the area of the placement may be disclosed as this is likely to be important information for the data subject.

***Can comments made by foster carers about the subject be shared?***

Comments about the data subject are the data subject's personal information and as much of this information as possible should be shared with the data subject.

Care must be taken with opinions expressed by foster carers, however, as foster carers, although acting in a professional capacity, are likely to be the personal data of the foster carer and therefore owed a duty of confidence by the data controller, which would be different from that usually owed to other professionals.

With older files it may not be possible to trace the foster carer, or as stated above, the data subject may not want the foster carer to be aware of their request for access to their records.

It should be taken into account that foster carers may be unaware that their comments may be shared with the data subject (particularly for older files) and the nature of the information should be considered. However, in recent years foster carers are likely to be more aware through training that records may be disclosed to children.

The foster carers may be expressing distress at the behaviour of the data subject and the language used to convey this may cause embarrassment to both the foster carer and the data subject. The GDPR covers information rather than the production of copy documents and it is therefore possible in this case to give a summary of the information, giving the gist of what was said (i.e., that the foster carer was distressed at the behaviour), whilst removing anything particularly offensive. That way the information is still being shared, but without causing further distress to either party.

The effect of disclosure of the information on the foster carers should be considered as well as the effect any possible breach of confidence may have on the future exchange of information between the foster carers and social workers. For example, if the foster carers feel their confidence has been breached, they may feel less willing to share views on future foster children and this may have a detrimental effect on the care of any future child in their care.

The duty of confidence to the foster carers should be weighed against the data subject's right to their personal information. Again, this will depend on each individual case and decisions on disclosure and the reasons for them must be recorded.

1. **Professional opinions and reports**

***Do professional third parties need to be contacted to give consent for disclosure of information they have provided in the files?***

Reports commissioned by Portsmouth are Portsmouth's information and it is therefore not necessary to seek authorisation to share these reports.

In the case of opinions expressed by third party professionals, and reports not commissioned by Portsmouth, these should be open to be shared, as professionals should stand by their professional opinions. It is still necessary to bear in mind any issues of confidentiality contained in these reports.

Some of these records such as LAC health reports or school reports are also records that would have been shared with the child or parents at the time and therefore a judgement can be reached about sharing them.

It is good practice to seek consent where possible from professionals, for example police reports and in the case of medical information, you must not disclose it without the consent of the professional.

Advice can be sought from legal services and the Corporate Information Governance team & Data Protection Officer

We would normally write to individuals to inform them that the information they provided is going to be shared with the data subject.

1. **Medical records**

***Can parents' medical information be shared with the data subject if it has a direct bearing on the mental or physical health of the data subject*?**

As stated in point 2 above, medical information is sensitive personal data. Where the information has a direct bearing on the data subject's physical or mental wellbeing, however, the information is the same as medical information about the data subject and should not be disclosed unless a medical practitioner has determined that disclosure is unlikely to cause serious harm to the physical or mental health of that person or another individual.

The information may only be disclosed without seeking the opinion of the relevant health professional if the data subject already has knowledge of the content of the medical record. For example, the file may contain information relating to the data subject's parents' hereditary illnesses and in this case, this is classed as the data subject's medical information. The data subject may be aware of family medical histories and if so, this information may be shared without seeking the opinion of a relevant health professional.

***Can medical information directly relating to the data subject be disclosed?***

This is similar to the example above.

In the case of health information contained in old files, it is quite likely that this is information the data subject is aware of, for example old files often contain information about childhood illnesses / general health and this type of information may be disclosed without seeking the opinion of a health professional.

1. **Education reports**

***Can old school reports and correspondence be disclosed?***

Education information would generally be considered as provided by a relevant professional and not necessarily third-party information. School yearly reports and the like are generally clearly written about the child and to the child and their parents. If a child lived within their family, this is the type of information which is often readily available to them and passed on for safekeeping once they are an adult. It is often a valuable social history and record of the child's life in school, of their achievements, their interests and their relationships with staff and other pupils.

If the child was looked after, then this would have been shared with the LA as the corporate parent. It is likely that with requests from older data subjects that the school may no longer be in existence, the records no longer available in the school or the staff retired or deceased and there is no viable option in terms of seeking permission. Pragmatically, and in the interests of transparency and enabling access, it is likely that on balance this information can be disclosed.

1. **Social Work Exemption**

***If disclosure of some of the data subject's personal information may be distressing to them, can it be withheld?***

Personal information regarding the data subject is only exempt from disclosure if disclosing the information would be likely to prejudice the carrying out of social work by reason of the fact that serious harm to the physical or mental health or condition of the data subject or any other person would be likely to be caused.

If the data subject is no longer in receipt of social work support this exemption cannot be applied. This is quite likely to be the case for the older files. For older files the data subject may no longer live in the area, in this case it is necessary to contact their local authority adult and mental health teams, if there is information in the file which may be harmful to the physical or mental health of the data subject or another person, to check whether they are currently receiving a service. If they are receiving a service, it will be necessary to liaise with their current worker as to whether the information should be disclosed to the data subject. Again, all decisions must be recorded. If the data subject is not receiving a service, this exemption cannot be applied, and the information should therefore be disclosed.

1. **Information relating to deceased individuals**

***Is the data subject allowed to see information relating to family members who are now deceased*?**

Access to deceased individual's records may be obtained via Freedom of Information legislation (FOI) all such requests should be directed to the Corporate Information Governance team.

The GDPR does not cover data relating to deceased individuals, although a duty of confidence relating to personal data still applies after death. It is necessary to consider the feelings of the deceased, if known, prior to death, and the impact disclosure may have on any living individual, when deciding whether to disclose sensitive information.

It may be acceptable to disclose information regarding deceased individuals to their next of kin. Entries on the Permission to Share form should be considered.

The most common example in this case is where the data subject wants information about their deceased parents. In this case information not considered sensitive should be disclosed. It is necessary to take more care with information the deceased may not have wanted to be shared, for example information regarding parents' marital relationship which may not be of relevance to the data subject.

1. **Requests from parents for children's information**

See the guidance within the main procedures as above for the full details.

***Can parents have access to their children's records?***

It was previously thought, that as a guide, children aged 12 and over could generally give consent for their information to be shared with their parents. However more up to date guidance suggests that the decision should be about the child's level of maturity, the nature of the personal data, and consequences or detriment to the child, view of the parent by the child, whether the child has expressly indicated that they don't want information shared. The concept of Gillick competence can be useful.

If the case is open the views of the current social worker should be sought, to determine whether the child is able to give informed consent to their information being shared. If the child refuses, the information should not be shared with their parents. There may, however, be information in the file specifically relating to the parents and as this would be the parents' personal data, this may be shared with the parents, removing any of the child's personal information.

If the child is not capable of giving informed consent, parents with parental responsibility can have access to their child's information, as long as it is believed that the parents are acting in the child's best interests.

With regard to parents without parental responsibility, it is necessary to consider the rights of the parents to a private and family life under the human rights act, when deciding whether to disclose a child's information. For example, a father who does not have parental responsibility for, and does not have day to day care of his child, has no specific rights to access information about this child. His right to a private and family life, however, should be respected and information given where appropriate, even if the child's mother objects, as long as there is no suggestion that disclosing the information could be harmful. Enquiries should be made to determine this, for example with the school.

***If the child is old enough to give consent for their parent to view the files relating to them, what documents are required from the data subject?***

Often parents request access to their adult children's files. In this case it is necessary to seek permission from the data subject for the files to be shared with their parents. As well as consent, it is necessary to get copies of identification from the data subject, and to inform them that they may wish to view the files relating to them before they decide whether to agree to the files being disclosed to their parents. If the data subject agrees with the information being disclosed, identification must be sought from the parents. .

***If a parent requests social work files about their child, is there any information that should not be disclosed?***

Someone with parental responsibility for a child under the age of 18 may make an access to records request. In this case personal information should be withheld in the following circumstances

* The data subject provided the information in the expectation it would not be disclosed to the person making the request.
* It was obtained as a result of any examination or investigation to which the data subject consented in the expectation that the information would not be disclosed.
* If the data subject has expressly indicated that the information should not be disclosed.

1. **Requests made by an agent on behalf of the data subject.**

***Can individuals other than the data subject make a request on behalf of the data subject?***

The data subject may sometimes ask another person to request the files on their behalf, they may do this through a solicitor, a counsellor or other health professional, or family member. There is no reason why another person cannot request the files on behalf of the data subject, as long as they have signed authorisation from the data subject. In these cases, it is necessary to obtain copies of the signed authorisation, as well as two forms of identification for the data subject, and two forms identification for the agent. A Lasting Power of Attorney for Health & Care decisions would be required to enable the agent to request the files on behalf of the data subject. If the data subject does not have mental capacity ID would need to be obtained from their agent.

With requests such as these, the request should be processed as if it is the data subject requesting the file. It is important to note that, particularly with requests made through a solicitor, the sensitive nature of the file and the possible need for support may not be made clear to the data subject. It may therefore be necessary to discuss this with the agent and where possible (and where the data subject has capacity), make contact with the data subject to explain the nature of the files and suggest that they may like to consider getting support through the process. This is particularly important for files of a very sensitive nature which may be particularly distressing for the data subject.

1. **Summaries of documents containing a lot of third-party information**

***Can summaries of information be provided to the data subject if their information is contained within information relating to third parties?***

Sometimes the records we work with are very old and contain information about all of the family, rather than just the data subject. Sometimes the information relating to the data subject is difficult to separate from third party information which is of no relevance to the data subject. In this case it is possible to seek permission from the third party to disclose their information. If this is not possible or if the data subject does not want the third party to be contacted, the information specific to the data subject can be summarised. The GDPR covers access to information, rather than copies of documents, so information about the data subject can be provided in a different format to that of the original documents, as long as the general meaning of the information is not altered. Summaries should, however, be used only when it is impossible to redact the third-party information. As previously noted, the departmental guidance within Tri-ex does allow for the sharing of third-party information; *where it is not possible to obtain consent, discretion may be used to release information where there is no possibility of serious harm or it would be considered reasonable to disclose the information without the consent of the other individual.*

1. **Information relating to an alleged abuser**

***If there is information in the files relating to an alleged abuser of the data subject, do we need their consent before disclosing the information to the data subject?***

Any information about alleged or proven abuse of the data subject is likely to be to be the personal data of both the data subject and the alleged abuser. The fact the data subject made the allegations of abuse does not mean they are entitled to further information about the alleged abuser. It is necessary to bear in mind a number of considerations before deciding whether the information relating to the alleged abuser can be disclosed.

If the alleged abuser has been tried and convicted of the abuse then much of the information relating to the abuser and the trial is likely to be in the public domain, and in this case, it is likely that much of this information can be disclosed to the data subject.

However, some children are removed from their families due to abuse. In many circumstances whilst a criminal burden of proof is not achieved a judge in a care court will make a judgement stating that on balance of probability a child was abused by its carer. Consideration needs to be given to this information which, whilst not in the public domain, may already be known to the child through other avenues for example through a Children's Guardian.

If the alleged abuser was never charged, or if no trial ever took place, it is necessary to be more careful with disclosure of the information. It is important to bear in mind what the data subject already knows or remembers when deciding what can be disclosed.

It is possible that even with old files, the abuse has only just been reported, and there may be an investigation under way and any disclosure of the information may compromise the investigation. This must be taken into consideration when dealing with cases such as these. It is likely that if there is a police investigation under way relating alleged abuse, the files will be withheld until the investigation is complete. This should be discussed with the relevant police officer.

1. **Legal Professional Privilege**

***Can communication between the legal department and social worker, relating to the care of the data subject, be disclosed to the data subject?***

Communication between the department and legal services, external solicitors/barristers, and documents produced by the legal department are subject to legal professional privilege and must not be disclosed as part of the subject access request. Legal professional privilege also applies to legal advice contained in strategy meeting minutes, although it is questionable whether this exemption can apply to strategy meeting minutes contained in older files. It is advisable to contact members of the strategy meeting to ask for their permission to disclose. It should be made clear that if they do not give permission, they must set out the exemption to be applied, in order for the information to be withheld.

If you require any further advice or guidance on the disclosure of information, please refer the matter to the Council's Data Protection Officer (email [DataProtection@portsmouthcc.gov.uk](mailto:DataProtection@portsmouthcc.gov.uk) )

1. **Manifestly Unfounded or Excessive**

***Do I have to repeat a redaction that has previously been undertaken?***

In assessing whether the request for access to records is excessive you need to consider the interval between repeat requests, the nature of the data, the purpose for which they are processed and the frequency with which the data has been altered eg. If the information is archived and has not been added to or changed since compliance with the previous request this would suggest that there is no need to respond again. However, it is important to recognise the circumstances of the original request i.e. a young person leaving care who had no permanent abode etc may not have had the practical or emotional resources to keep their record.

**17 Redacting data, not documents.**

***Where the (particularly older) records might be really complicated as they are whole family records what can I do?***

Data doesn't necessarily mean whole documents; it is possible to provide a summary. This decision would need to be justified however and be proportionate and not a barrier to information being shared.

**PRACTICAL GUIDANCE FOR RESPONDING TO REQUESTS FOR INFORMATION/SAR.**

This process should be followed in line with the full guidance.

1. **If the child or young person (or indeed their parent) is currently open to children's social care and they *verbalise a wish* to access their files,** then:
   1. Their allocated worker (i.e. social worker or personal advisor) will have a conversation with them about what information they would like and if they need some specific information or want access to their full file.  Highlight the challenges of waiting for a full SAR in terms of timescales or about what they may find and the possible impact of this and that specific information can be provided outside of the SAR process.
   2. Support the young person by either providing the specific information they wish outside of the SAR process (advice can be given by their manager or the SAR team) or support them to make the SAR request (or both). Record the conversation in mosaic case notes.
   3. There should not be barriers to accessing a SAR.
   4. If a SAR request is made, the SAR team will identify a manager who will quality assure. This may not be a manager from the service if demand is too high.
   5. Once completed their full files should be provided, ideally through the PA or social worker who will support the young person to read their files if they so wish. The SAR team will also provide the name of the quality assuring manager as an additional point of contact.
2. **If the child or young person (or indeed their parent) is currently open to children's social care and they have *already made a SAR request*** then:
   1. Their allocated worker (i.e. social worker or personal advisor) will have a conversation with them about what information they would like and why and if they need some specific information or want access to their full file.  Highlight the challenges of waiting for a full SAR in terms of timescales or about what they may find and the impact of this. Record the conversation in mosaic case notes.
   2. Specific information can be provided outside of the SAR process, update the SAR team.
   3. If the request for a full SAR remains the SAR team will progress this and identify a manager who will quality assure. They may also contact the person/child. This may not be a manager from the service if demand is too high.
   4. There should not be barriers to accessing a SAR.
   5. Once completed their full files should be provided, ideally through the PA or social worker will support the young person to read their files if they so wish. The SAR team will also provide the name of the quality assuring manager as an additional point of contact.
3. **Where there is no current involvement by children's social care**
   1. The team processing the SAR will note the request i.e. whole file or specific information.
      1. They will identify how much information is held in both mosaic and paper files.
      2. Identify a manager who will be responsible for quality assuring once the redaction has been completed. Ideally the current or recent manager if open/recently closed.
      3. The SAR team will give an estimate of the volume of files to the manager and provide the SAR request if it has information about what is requested.
   2. Prior to the redaction, to give some context the identified manager can look at mosaic if it is the sole or partial source of information.
      1. They will then contact the person and have a conversation to confirm or clarify what information they would like to be provided with, what they seek to understand, why it is being sought and if they wish for specific information or confirm they want access to their full file.  This will be a sensitive conversation and highlight the likely delays and possible impact of information.
      2. This conversation must not be framed as an obstacle to a SAR.
      3. Specific information can be provided outside of the SAR process, but the person may still wish to proceed with the SAR.
      4. Record the discussion on mosaic case notes.
   3. Update the team processing the SAR request.
   4. Where it is either specific information or a full SAR the SAR team can provide this, redacting as needed and quality assured by the relevant manager. The manager can use their judgement and provide specific information, informing the SAR team that they have done so.
   5. The SAR team will provide the information or full completed file to the requester and provide the name of the manager as an additional point of contact.