

Adult Social Care and Health (ASCH) Directorate

Business Delivery Unit: Information Governance

Mosaic Restriction of Access Internal Approval Procedure

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Contents

Introduction.....	3
Scope.....	3
Process.....	3
Staff Due Diligence.....	4
Reviewing Restriction of Accessing.....	4
Restricting access where individuals or support network are known to KCC.....	4
Restricting access to children’s records for the AMHP Service.....	5
Review period.....	5

Introduction

This document provides guidance to help inform decisions on whether a restriction of access should be applied to a Mosaic record.

A Mosaic record refers to individuals' record of information that has been recorded through their journey of receiving support and care from Adult Social Care and Health (ASCH) services.

A restriction of access can be granted whereby a Mosaic record is "locked down" so only certain staff e.g., specific teams, can access information about the individual. This could be for numerous reasons, please see 'process' section for more information.

Scope

This document applies only to ASCH staff who have received a request or are making a request. This document may also apply to other internal KCC teams whereby the same circumstances apply. That is, have received a request or have made a request to have a Mosaic record restricted.

Process

Requests for restriction of access to be applied to a Mosaic record will be decided on a case-by-case basis.

Restrictions of access should only be applied where there is a risk to an individual being supported by Adult Social Care and Health, there is a risk to KCC staff or there is a risk to the organisation. Scenarios where the restriction of access could be applied are:

- Police investigation
- Law enforcement investigation e.g., fraud*
- Political sensitivity*
- High media interest and/or press enquiry*
- Inappropriate access* (depending on severity of inappropriate access)
- Safeguarding
- Data breach
- Individual or member of support network known to KCC staff

Restrictions of access can be made by Adult Social Care and Health staff or staff from other KCC internal teams. Authorisation needs to be received by the relevant Service Manager prior to making the request.

A restriction of access needs to be received by the ASCH Systems Team and Information Governance Lead (Lauren Liddell-Young) by completing the [request form](#) available on Knet. The request will need to detail the reason(s) why a restriction of access needs to be applied.

The restriction of access request will be reviewed by the ASCH System Team and Information Governance Lead to decide if the restriction should be applied. The requestor may be contacted for further information to be obtained prior to a decision being made. In

instances where the restriction of access request is for those scenarios marked with an asterix (*) the Head of Systems and Performance will make the final decision.

Where a restriction of access request has been granted, a separate record of these will be kept by the ASCH Systems Team for audit and review purposes.

Staff due diligence

Staff must follow KCC's Code of Conduct and have a duty not to inappropriately access records that they have no legitimate interest to access and should avoid any requirement to access the record. If evidence arises that confirms that ASCH staff or other internal KCC team staff have accessed records inappropriately this will be reported in-line with KCC's Data Breach Policy to the Information Resilience & Transparency Team and access to Mosaic will be reviewed.

Staff will also ensure their mandatory training (Information Governance, GDPR and NHS Data Security Level 1 Awareness) are also completed and refreshed when required. If it is confirmed that mandatory training has not been kept up to date, access to Mosaic will be reviewed.

Reviewing restrictions of access

The ASCH Systems Team and Information Governance Lead will review applied restrictions of access on a quarterly basis. The original requestor may be contacted to ensure the restriction of access still needs to be applied. If it is agreed the restriction of access can be lifted the Mosaic record will be "re-opened" to be made available.

A restriction of access may be temporarily or permanently lifted if this prohibits providing support and care to an individual. This may be in cases where the "act for" or "virtual worker" functions need to be applied in Mosaic.

When viewing a record that has had a restriction of access applied this will show as 'access to this record is restricted' and if you use act for, 'access to this record is restricted. Please contact the system administrator for more details.' The latter notification will be applied to all Mosaic users as a safety precaution.

If a Mosaic user access a restricted record whereby they are restricted to see the record, the notification will show as 'Access to this record is restricted. Please contact the system administrator for more details.' Only visible details will be name, ID number and date of birth.

Restricting access where KCC staff know the individual or support network

All ASCH staff, and where applicable other internal KCC team staff, are aware that access to records are only permitted where they have a legitimate interest e.g., providing care and support to an individual, and any inappropriate access will be reported in-line with KCC's Data Breach Policy to the Information Resilience & Transparency Team. Restrictions of access due this reason will only be made in exceptional circumstances e.g., individual or staff safety.

Restricting access to children's records for Approved Mental Health Professionals

During an assessment conducted by the AMHP Service a child's record may need to be recorded on Mosaic. This record will be available for ASCH staff to view. However, specific AMHP record details will only be available to the AMHP Service.

Review period

This document will be reviewed on a yearly basis (September). Any changes or updates will be reflected within the version control and circulated thereafter as soon as possible. Please ensure you use the most up-to-date copy of this document.

Please email lauren.liddell-young@kent.gov.uk regarding any updates or changes for this document.