



Carefirst Guidance On Restricted Access Requests and Reviews



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Overview

The Restricted Access procedures have recently been reviewed and the following new process has been agreed for requesting and maintaining Restricted Access to records on Carefirst. This will allow us to keep a better control of restricted records within the system and give us better information on all of our restricted records, as well as ensuring that hard copy and electronic information is also adequately restricted.

The revised guidance outlines criteria for appropriate file restriction requests and these are explained under the heading of "*Categories for Restriction*" below. It is the responsibility of Team Managers to carefully consider any restriction requested by their staff before a formal request is submitted to either of the following Managers for final authorisation:

Service Manager – Children & Families
Service Manager - Criminal Justice
Service Manager - Adult Services

Service Manager – Older People Services

Only where the Team Manager considers this to be absolutely necessary, should any formal request for Restricted Access be made.

All staff have a professional responsibility to access Carefirst records only when there is a clear business need for doing so. A Restricted Access request should not be necessary to prevent members of staff accessing records inappropriately. If there are concerns that this may be happening a Fact Finding Investigation should be initiated to establish whether or not this is the case.

Categories for Restriction

1. Employee

- Any EDC employee or HSCP staff within the organisation where their records could be accessed by colleagues.
- Elected Members
- Voluntary Workers within the Organisation
- Students on Placement

2. Employee's Immediate Relative (Employee Details MUST be Provided)

3. Subject to Investigation

• Fact Finding – when an investigation is underway to establish if an employee has been inappropriately accessing customer records (in this case it will be the customer record(s) that will be restricted).

4. At the Service User's Request

• Only used in exceptional circumstances when a Service User has an immediate personal connection to an employee.

5. High Profile

- Customers who have come or who could potentially come to the attention of the media.
- Customer cases which are of potential public interest or represent areas of sensitivity.

6. Witness Protection

- When a customer is subject to Witness Protection.
- Where a customer is at risk of abduction or anonymity needs preserved.

Please note that these categories **WILL NOT** be visible to Carefirst Users who do not have access to the record – these will be recorded in the background of the record.

Requesting Restricted Access

Requests for Restricted Access should be made by either a Worker to their Team Manager and then to the appropriate Service Manager or by a Team Manager to the appropriate Service Manager. The following procedures detailed below **MUST** be followed:

A **Restricted Access Request** Form requires to be completed (Appendix 1). Please note that the editable forms are contained on the HUB.

Please note that if the Restriction is for a family, a separate form for each family member $\underline{\text{MUST}}$ be completed.

Worker Completing the Form(s) MUST:

- Check the Network for details of other Workers/Teams who may be working with the customer/family. If there are others involved, Workers MUST take this into consideration when detailing who should get access to the record.
- Completes the form(s) with FULL Details
- Forward the form(s) to their Team Manager for approval
- Team Manager with then forward the form(s) to the appropriate Service Manager for authorisation

Team Manager Completing the Form(s) MUST:

- Check the Network for details of other Workers/Teams who may be working with the customer/family. If there are others involved, Team Managers MUST take this into consideration when detailing who should get access to the record.
- Completes the form(s) with FULL Details
- Forward the form(s) to the appropriate Service Manager for authorisation

Where the reason for the restriction is an Employee or Employee's Relative, it is **MANDATORY** that the Employee Name, Relationship to Employee (if relative), Carefirst ID and Work Location are provided. The form(s) will **NOT** be processed without this information.

Service Managers MUST:

• Forward the completed form(s) advising that they are happy to authorise to the Carefirst Team Mailbox with a copy to the Team Manager.

Processing of the Restricted Access Request - Carefirst Team

On receipt of the Authorising Email, the Carefirst Team will process the form(s) and carry out the following tasks:

- 1. Check the form(s) to make sure they are completed fully. Please note that forms will be returned if information is missing which will result in a delay of the restriction being processed.
- 2. Add the Restriction(s).
- 3. Add the relevant staff members who have been granted access.
- 4. Add the Restricted Warning (Detailing the Workers/Manager who have access to the record).
- 5. Add the Restricted Observation(s) using information from the form(s).
- 6. Save the Restricted Form(s) securely within the Carefirst File Path.
- 7. Advise the relevant staff members via email when the Restriction(s) has been put in place.

Requesting Additional Access to a Restricted Record

Where additional staff require access to a Restricted Record on Carefirst, the staff who need access should look at the Restriction Warning to find out the Team Manager who requested the restriction and contact them. Alternatively, in their absence, staff are to contact the Service Manager who authorised the restriction. The Team Manager or Service Manager will then email the Carefirst Team with the name(s) and Carefirst ID(s) of the staff to be granted access.

Reviewing Restricted Access

Restricted Records will be reviewed on a yearly basis by the Restricted Access Working Group.

The group will review the Restricted Records on a case by case basis as well as review the staff members who have access to the Restricted Records.

The Carefirst Team will update the Restrictions as per advice from the Working Group in relation to the Staff Members.

For the removal of Restricted Records – this information requires to be forwarded to the Service Managers for approval (see next section).

Requesting the Removal of Restricted Access

Requests to remove Restricted Access must be made by a Team Manager to the appropriate Service Manager. The following procedures detailed below **MUST** be followed:

A **Request to Remove Restricted Access** Form requires to be completed (Appendix 2). Please note that the editable forms are contained on the HUB.

Please note that if the Restriction is for a family, a separate form for each family member <u>MUST</u> be completed.

Team Manager Completing the Form(s) MUST:

- Completes the form(s) with FULL Details.
- Forward the form(s) to the appropriate Service Manager for authorisation.

Service Managers MUST:

 Forward the completed form(s) advising that they are happy to authorise to the Carefirst Team Mailbox with a copy to the Team Manager.

Please note that when a Restriction is removed, the Carefirst Team will **DELETE** the Restricted Observation so that no other user can see the reason(s) for restriction.

Other Considerations

When requesting Restricted Access for a record on Carefirst consideration **MUST** be given to where any other information in relation to the customer is stored i.e., the electronic files stored on the Network and Desktops and also where hard copy files are stored. As paper files are no longer kept for new cases, the latter makes reference to historic files within Unit 10 at Kilsyth Road, Kirkintilloch and Iron Mountain.

Please note that it is **NOT** possible to password protect a folder within the network. To restrict a folder within the Network, you **MUST** submit a Change Request Form to ICT outlining the name of the folder and where it is located and the names of staff members who need access to it.

All other information stored on the customer should be subject to the same restrictions requested for the Carefirst record.

Unrestricted Access to Carefirst

Please note that there is a very small number of Carefirst Users who have been granted Unrestricted Access to Carefirst for business purposes which enables them to access ALL records including the Restricted Records.

Over and above these staff members, the only people who can access Restricted Records are those that have been granted access via the **Restricted Access Request** Form.

If you require to know who has unrestricted access, please contact the Carefirst Team.

What To Do When a Team Manager Responsible for a Restricted Record Leaves

When a Team Manager leaves, the Team Manager who takes over a restricted record they **MUST** email the Carefirst Team with the following details:

- The name of the Receiving Team Manager
- The names of the Workers who require access to the record.
- Request the removal of the previous Team Manager access and their associated Team Members access (if appropriate).

For cases that get transferred, the Transferring Team Manager **MUST** email the Carefirst Team with the following details:

- The name of the Receiving Team Manager
- The names of the Workers who require access to the record.
- Request the removal of their Transferring Team Manager) access and their associated Team Members access.

Procedure Approval

This procedure was approved by the following:

Approved By:	Designation	Date Approved
Derrick Pearce	Head of Community Health & Care Services	11/09/2018
Caroline Sinclair	Head of Mental Health, Learning Disability, Addictions & Health Improvement & Interim Chief Social Work Officer	12/09/2018
Claire Carthy	Interim Head of Children Services & Criminal Justice	12/09/2018

This procedure will be review on a yearly basis by the Restriction Working Group.

Appendix 1

RESTRICTED ACCESS REQUEST FORM							
CUSTOMER DETAILS (A Separate Form Is Required For Family Members)							
Name:	Carefirst ID: Are They Part of a Family of Restrict		Are They Part of a Family of Restriction	s:			
WORKER / TEAM MANAGER REQUESTING RESTRICTED ACCESS							
Name: Carefirst ID: Date of Request:							
CATEGORY OF RESTRICTED ACCESS (ONLY ONE CATEGORY CAN BE CHOSEN)							
Customer is an Employee		Customer is an Immedia	ediate Relative of an Employee				
Elected Member		Customer is an Immedia	Customer is an Immediate Relative of an Elected Member				
High Profile Case		Witness Protection					
At Customer's Request		Subject to Investigation					
F	REASC	N FOR RESTRICTED	ACCESS				
Provide FULL details of why you want this replease detail their names, relationship and w			if customer is an Employee or Relative of Em k for etc:	ployee –			
I confirm that I have checked the Network fo	r other	Workers/Teams who may al	so be involved with the customer.				
		GRANTED ACCESS ice Staff MUST also be listed purposes.	TO THE RECORD I below if they require access to the record fo	r business			
Name	Des	signation	Carefirst ID				
TEAM MANAG	ER AF	PROVING RESTRICT	ED ACCESS REQUEST				
Name:			Date of Approval:				
I confirm that I have made the necessary arrangements for the hardcopy Casefile(s) to be made secure and the only employees granted access are detailed above. (This refers to Unit 10 @ Kilsyth Road and Iron Mountain)							
FORM MUST BE AUTHORISED BY THE APPROPRIATE SERVICE MANAGER FOR YOUR AREA: Children and Families - (Suzanne Greig & Raymond Walsh) Justice Service - (Alex O'Donnell) Adult Services - (Richard Murphy & Stephen McDonald – Interim Measure) Older People Services - (Stephen McDonald)							
Authorised By: Designation:							
Date Authorised:							

OFFICIAL USE - TO BE COMPLETED BY CAREFIRST TEAM ONLY			
I confirm that I have added the Restricted Category.		Date:	
I confirm that I have added the relevant Staff Members who have been granted access.		Date:	
I confirm that I have added the "Restricted – see notes for who has Access" Warning		Date:	
I confirm that I have added a "Restricted Access" Observation detailing the Restriction Request.		Date:	
I confirm that I have saved this Form securely within the appropriate Carefirst File Path (H/Restrict/Carefirst/RESTRICTED ACCESS FORMS).		Date:	
I confirm that I have saved the Email Requesting Restriction within the appropriate Carefirst File Path (H/Restrict/Carefirst/RESTRICTED ACCESS FORMS).		Date:	
I confirm that I have emailed the relevant Workers/Managers advising that the Restriction has been put in place.		Date:	
Processed by:		Date:	

Appendix 2

REQUEST TO REMOVE RESTRICTED ACCESS						
CUSTOMER DETAILS (A Separate Form is Required For Family Members)						
Name:	Carefirst ID:	Are they Part of a Family of Restriction	s:			
If YES – Are the Other Family Members Restriction Being Removed? (Complete a Separate Form for Each Family Member)						
TEAM MANAGER	REQUESTING RE	MOVAL OF RESTRICTED ACCESS				
Name:	Carefirst ID:	Date of Request:				
REASO	N FOR REMOVAL C	F RESTRICTED ACCESS				
Provide FULL details of why you customer is an employee who n		Access to be removed. For Example – if DC, please detail this.				
CATEGORY OF RESTRICTED ACCESS (PLEASE OUTLINE THE CATEGORY THE RECORD WAS RESTRICTED UNDER)						
Customer is an Employee	Customer is an Im	nmediate Relative of an Employee				
Elected Member	Customer is an Immediate Relative of an Elected Member					
High Profile Case	Witness Protection					
At Customer's Request	Subject to Investigation					
I confirm that I have made the necessary arrangements for the hardcopy Casefile(s) to be made available to those that require access. (This refers to Unit 10 @ Kilsyth Road and Iron Mountain)						
I confirm that I have made the necessary arrangements to unrestrict the Customer's Electronic Folders (i.e., WORD / EXCEL). A Change Request requires to be submitted to ICT.						
FORM MUST BE AUTHORISED BY THE APPROPRIATE SERVICE MANAGER FOR YOUR AREA:						
Children and Families - (Susan Greig & Raymond Walsh) Justice Service - (Alex O'Donnell) Adult Services - (Richard Murphy & Stephen McDonald – Interim Measure) Older People Services - (Stephen McDonald)						
Authorised By:	1	Designation:				
Date:	,					

PLEASE **EMAIL** THE AUTHORISED FORM TO: The "Carefirst Team" Mailbox

OFFICIAL USE - TO BE COMPLETED BY CAREFIRST TEAM ONLY			
I confirm that I have removed the "Restricted Access" Observation detailing the Restriction Request.		Date:	
I confirm that I have ended the "Restricted – see notes for who has access" Warning.		Date:	
I confirm that I have ended the Restricted Category.		Date:	
I confirm that I have ended the Workers who had access.		Date:	
I confirm that I have saved this Form securely (password protect) within the appropriate Carefirst File Path (H/Restrict/Carefirst/RESTRICTED ACCESS FORMS).		Date:	
I confirm that I have saved the Email Requesting the Restriction within the appropriate Carefirst File Path (H/Restrict/Carefirst/RESTRICTED ACCESS FORMS).		Date:	
I confirm that I emailed the Team Manager advising that the Restriction has been removed.		Date:	
I confirm that I have moved the Email Requesting the Restriction to the Restrictions Removed Folder within the Carefirst Mailbox.		Date:	
Processed by:	Date:		
Designation:	Date.		