

Improving NHS Subject Access Request Delivery

Helping NHS organisations meet growing demand through orchestration, automation and governed AI.



Why Delivering NHS SARs on Time Can be Challenging

Meeting statutory timescales becomes increasingly difficult when SARs depend on fragmented processes, disconnected systems and manual coordination.

Increasing SAR volumes

As legislation and NHS guidance continue to evolve, organisations must be prepared to manage increasing operational demand and complexity

UK GDPR Article 15; Data Protection Act 2018

More Complex Requests

Modern SARs increasingly require clinical review, serious harm assessments, third-party considerations and complex disclosure decisions.

NHS England – Subject Access Request Guidance

Information Fragmentation

Patient information often remains distributed across clinical and administrative systems, increasing the effort required to retrieve and coordinate records.

NHS England SAR guidance

Regulatory Scrutiny

Failure to meet statutory Subject Access Request obligations can result in ICO investigations, reprimands and enforcement action, placing organisations under increased regulatory scrutiny.

ICO – Can the right of access be enforced?

By connecting workflow, digital workers, AI and human expertise into one governed operating model, NHS trusts can:

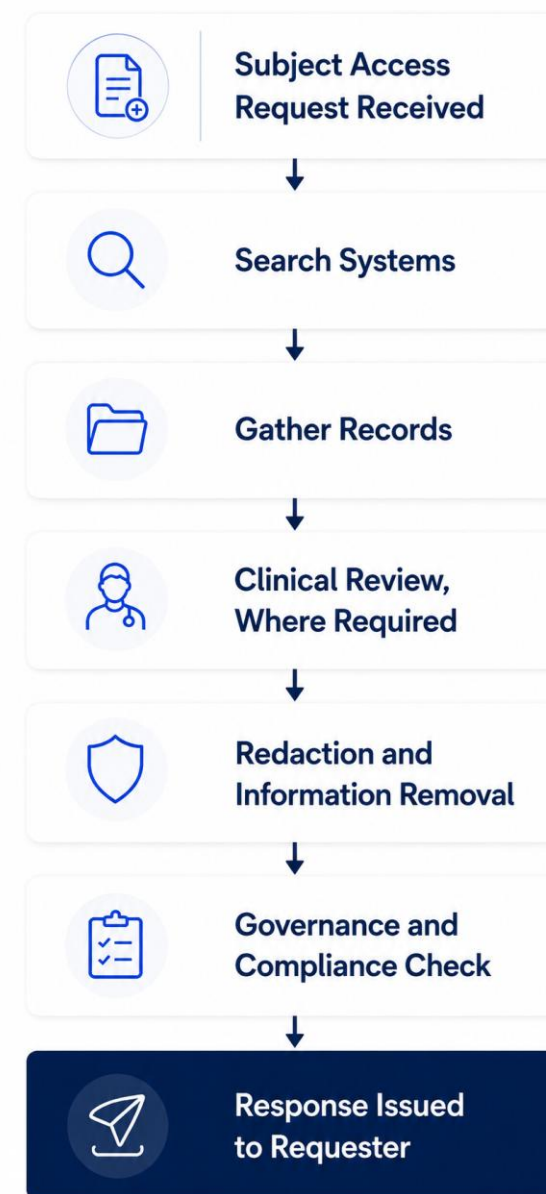
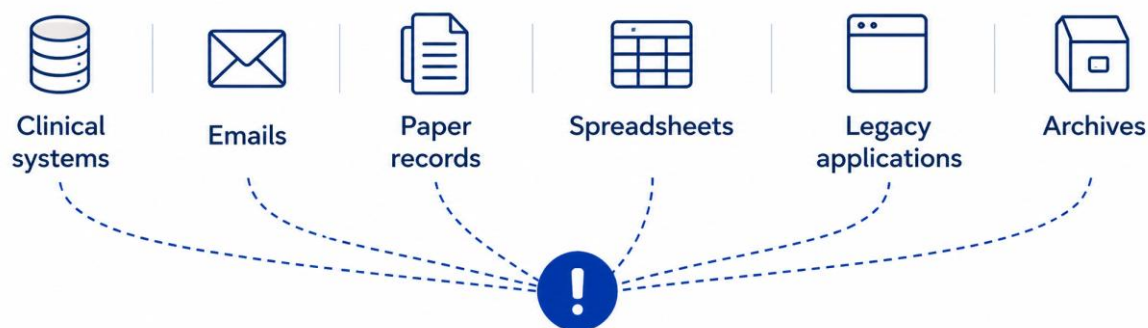
- Reduce manual administration across the SAR lifecycle
- Improve visibility of every live request and statutory deadline
- Coordinate people, systems and automation through one workflow
- Deliver faster, more consistent and compliant Subject Access Requests

Every Request Depends on Extracting Data from Multiple Processes

NHS organisations are expected to retrieve personal information from all relevant systems in response to a Subject Access Request. **As NHS digital estates continue to expand, patient information becomes increasingly fragmented across clinical, operational and legacy applications, making requests progressively more difficult to coordinate, govern and deliver within statutory timescales.**

- [NHS England Guidance for Information Governance Professionals](#)

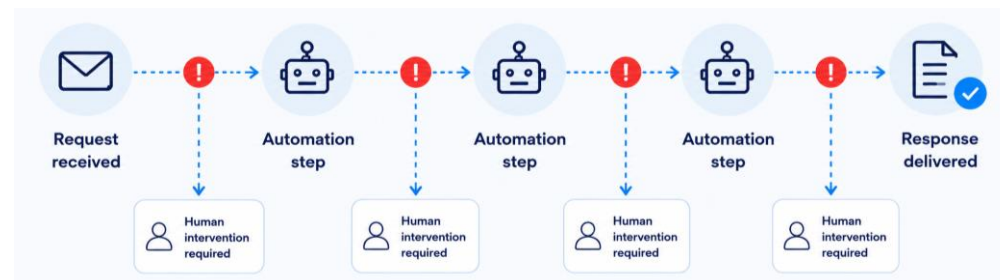
Many of the activities involved in processing a Subject Access Request are already being automated, including retrieving records, assembling disclosure packs, routing work and monitoring statutory deadlines. However, automating individual activities alone is not enough. **OAS connects every stage into one governed end-to-end workflow, ensuring work is routed to the right people, approvals are captured and every action remains fully auditable before information is disclosed.**



Why Basic Automation Alone Doesn't Solve the SAR Challenge

EXISTING APPROACHES	OAS APPROACH
Individual automations across clinical and corporate services	Orchestrates the complete SAR process
Clinical and administrative systems operate independently	Connects people, systems and workflows
Cases passed between Information Governance, clinicians and operational teams	Coordinates the complete workflow automatically
Multiple case trackers and email handovers	One governed case management process
Visibility limited to individual stages	End-to-end operational visibility
Every document must be manually reviewed to identify third-party information and disclosure risks.	AI screens documents, highlights potential disclosure risks and prepares records for rapid human review while authorised staff retain control.

Manual document review is one of the largest operational burdens in the SAR process. OAS uses AI safely and conservatively to reduce this effort while keeping disclosure decisions under authorised human control.



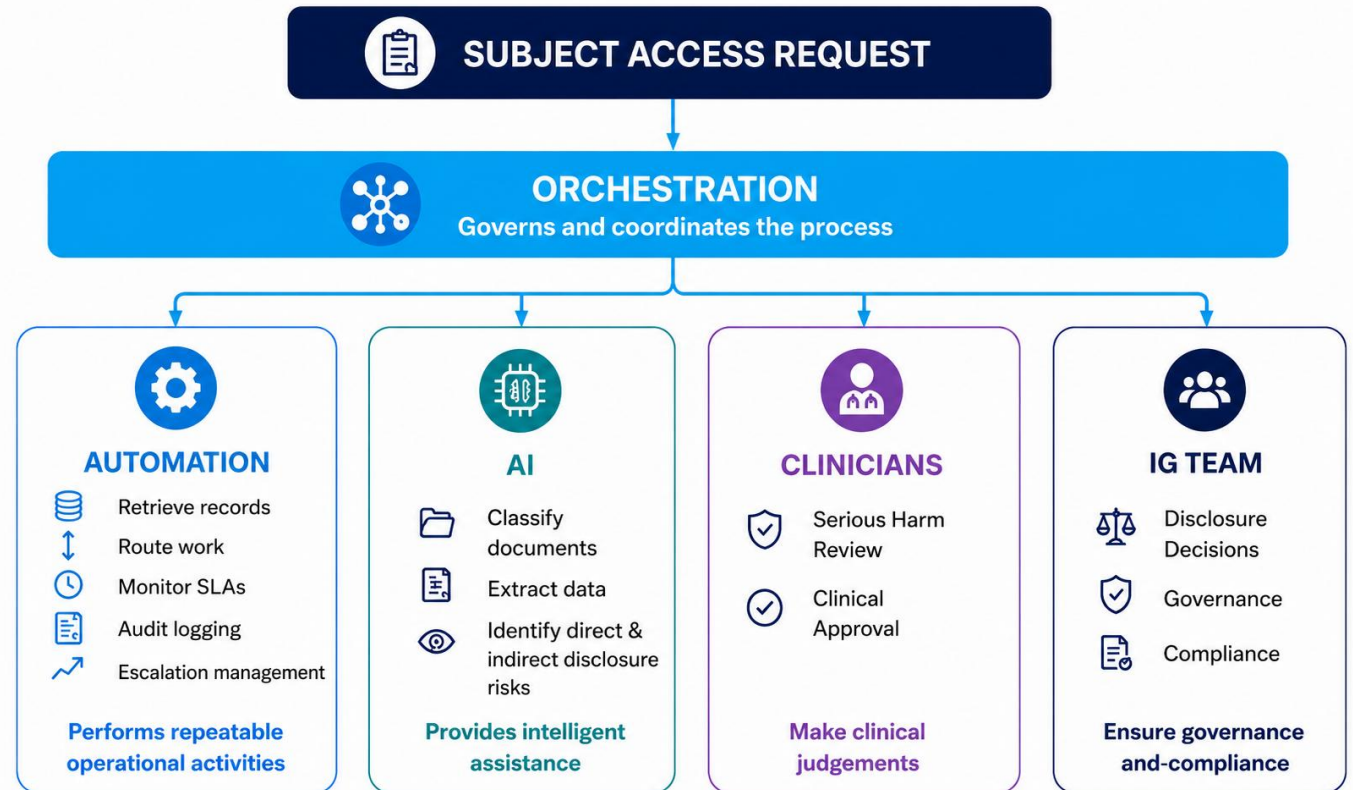
- 1 No end-to-end visibility of SAR progress and risk.
- 2 Unclear ownership of actions and outcomes.
- 2 Delays caused by handovers, chasing and rework.
- 4 Higher risk of missed deadlines and non-compliance.
- 5 No single source of truth for performance and insight.
- 6 Hidden backlogs and bottlenecks increase the risk of missed statutory deadlines.

One Connected Operating Model For Subject Access Requests

The OAS orchestration layer helps NHS teams deliver Subject Access Requests accurately, consistently and within statutory timescales.

By connecting systems, automation, AI-assisted activities and accountable human decision-making into one governed workflow, it reduces manual coordination, accelerates information gathering and provides complete visibility across every stage of the process.

The result is greater confidence that every request progresses efficiently, every decision remains traceable, and every disclosure is completed with a complete audit trail, appropriate clinical review, and information governance.



OAS automates the administration, coordination and information gathering, while clinical and Information Governance professionals retain responsibility for the decisions that require human judgement.

How the Operating Model Changes Delivery

Current Operating Model	OAS APPROACH
Requests enter through uncontrolled channels.	Requests are identified and registered through a governed intake process.
Staff chase records manually across systems.	Digital workers retrieve records from clinical, administrative and legacy systems.
Documents are assembled and reviewed manually.	Records are indexed, deduplicated, classified and prepared for review.
Redaction depends heavily on individual judgement, stamina, and repetitive reading.	AI highlights direct and indirect disclosure risks while authorised staff retain control. The model learns from human input increasing indirect identification.
Deadlines are managed through spreadsheets and reminders.	SLAs/KPIs, and intermediate milestones, alerts and escalations are built into the workflow.
Quality is checked late in the process (or not at all).	Completeness, redaction and approval controls operate throughout the case.

Orchestration coordinates each step of the Subject Access Request lifecycle.

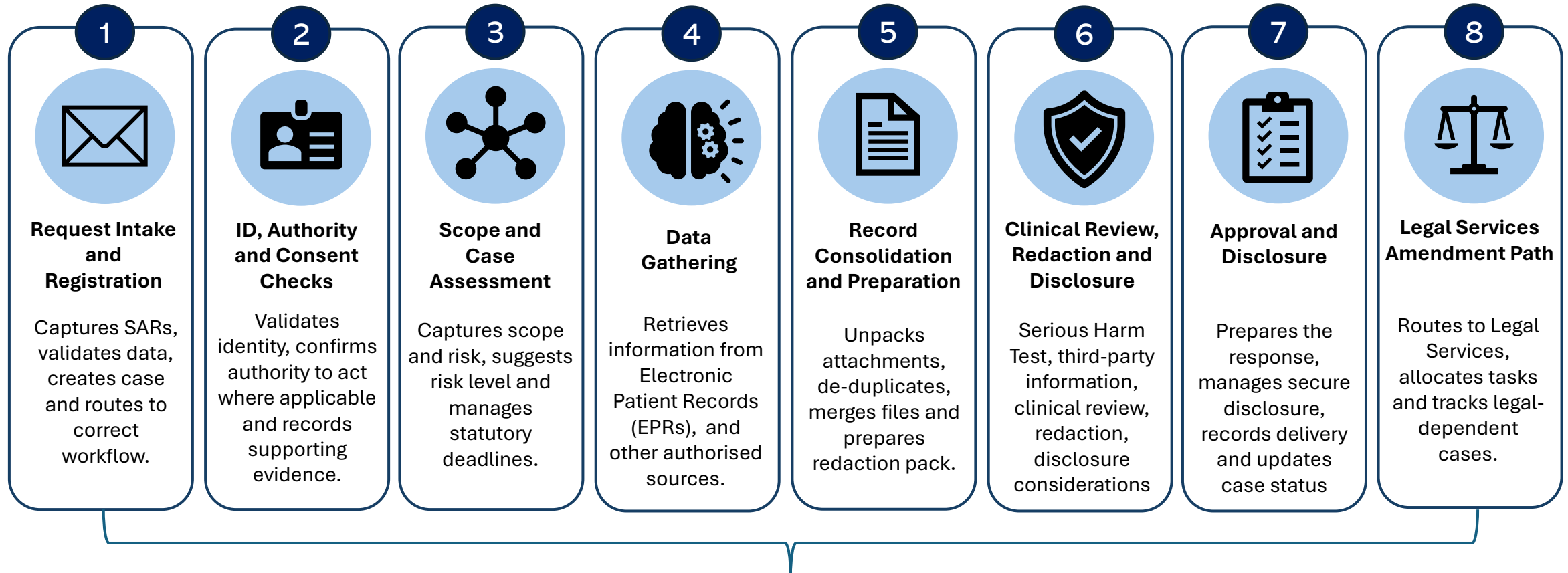
It brings together people, systems, digital workers, AI and governance into a single controlled workflow, ensuring every required activity, review and approval is completed in the right order, by the right people, at the right time.

The result is a coordinated, transparent and governed process where nothing is overlooked, and every case progresses with confidence and is delivered on time.

The OAS

SAR Process Overview

✓ Delivering requests within statutory timescales



Supporting timely responses through end-to-end visibility, governance, auditability and performance monitoring

The Benefits

Transforming how NHS trusts manage Subject Access Requests



Significant reduction in cycle time (human effort)

Well over **75%** achievable depending on the amount of human effort removed.



Reduction in collation and bundling errors

Fewer mistakes, less rework and higher quality redaction packs every time.



Reduction in the time taken to redact documents

AI technology can auto redact and facilitate human approval. Staff can add new redaction criteria and the model learns.



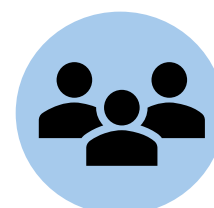
Delivering Complete and Compliant Responses

All SARs resolved in statutory timeframes, improving compliance and reducing escalation risk.



ROI can be delivered within year 1 of deployment

Measurable return through reduced manual effort, improved efficiency and lower operational cost.



More Time for Specialist Work

Reduces administrative workload, enabling governance teams to focus on clinical judgement and complex cases.

Contact us to discover how OAS can help your NHS trust reduce cost, improve your SAR compliance and deliver faster, more consistent outcomes.

GET IN TOUCH

Transforming Subject Access Requests through orchestration, automation and governed AI.

The result is reduced manual effort, greater visibility, improved governance and more consistent statutory compliance—without replacing your existing systems.



enquiries@globaloas.com

Arrange a conversation with our team to explore where intelligent orchestration could deliver the greatest value across your Subject Access Request process.

The OAS logo, consisting of the letters 'OAS' in a bold, blue, sans-serif font. The 'A' is stylized with a red square dot above it. The logo is positioned on a glass wall in the background of the office setting.

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