

Subject Access Request Policy (External)

Document Control

Reference: SAR Policy

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1. Purpose

Under the GDPR individuals have the right to access their personal information and data held by organisations. When an individual requests their information and data it is known as a 'Subject Access Request' or a SAR.

This document explains the key points regarding a Subject Access Request and acts as an overview of how such requests are managed.

Please also see the associated SAR documents:

- Subject Access Request – Request Form (A request form for individuals to use)

2. Key Points - Subject Access Request

What is subject access?

The GDPR gives individuals the right to request access to their data and is commonly referred to as a Subject Access Request or SAR. A Subject Access Request enables individuals to find out what personal data an organisation holds about them.

What is personal data?

For information to be personal data, it must relate to a living individual and allow that individual to be identified from it (either on its own or along with other information).

Does a SAR need to be in a specific format?

No. A SAR simply needs to be made in writing. A form can be made available and although it's not mandatory to be used it may assist the individual to provide the required information to deal with the request.

What information is an individual entitled to?

Subject access is most often used by individuals who want to see a copy of the information an organisation holds about them. Subject access provides a right for the requester to see their own personal data, rather than a right to see copies of documents that contain their personal data.



What is the time limit for responding?

In most cases, an organisation must respond to a subject access request promptly and within one month.

Is any information exempt from subject access?

Yes. Some types of personal data are exempt from the right of subject access and so cannot be obtained by making a SAR. Information may be exempt because of its nature or because of the effect its disclosure is likely to have.

3. Subject Access Requests – Process Overview

1 – Initial Request

To make a request, please write to the iSAMS Data Protection Officer gdpr@isams.co.uk

The written request should include

- details of your name, contact number, email
- details of who is making the request (you or a representative)
- the information you require
- any date ranges
- reasonable information to confirm identity

A SAR form is available to assist with your requests

2 – Receiving the Request

Upon receiving the SAR, the iSAMS Data Protection Officer records the request in the 'Subject Access Request – Log'

3 – Identity Check

Checks will be made to confirm your identity and the process only continues once identity is confirmed. Should further checks be necessary, you will be made aware.

4 – Request Check

The request is checked to confirm that it is an actual Subject Access Request. Other requests for information such as 'how many days holiday do I have left?' or 'what is my username?' will be handled as 'normal' requests and do not follow the SAR process

5 – Acknowledgement

Providing the request is a SAR, the iSAMS Data Protection Officer will send an acknowledgement letter to the you

6 – Data Gathering

The DPO co-ordinates the request with the relevant departments.

If iSAMS is unable to provide the request information, you will be made aware that no such information is available.

If iSAMS does have the requested information, the DPO initiates the gathering of the requested information

Should the data contain any complex codes, a key will be made available



7 – Redacting

Once the requested information is gathered, the responsible persons will redact the data to ensure that no third party personal data is include.

9 – Approval

The redacted data is collated by the DPO for approval prior to transferring to you

10 – Secure Transfer Return

The DPO agrees an appropriate and secure method of transfer with you. Transfer could be via:

- hand delivery and signage on receipt
- recorded delivery post
- encrypted password protected file

Upon transfer of the information, DPO sends you a SAR Release Letter. The DPO also follows up with you to confirm that the SAR has been received. Once confirmation has been received, the DPO will update the SAR log and close the record.

Responsibilities

You are responsible for providing the relevant information to assist with the request

You are responsible for providing sufficient identification

The iSAMS Information Security Team are responsible for accepting and managing SAR requests

The Management Team are responsible for gathering the requested information, carrying out redactions and providing appropriate keys

The DPO is responsible for logging all requests, liaising with the requestor, approving the redaction and transferring the requested information

Change History Record

Issue	Description of Change	Approval	Date of Issue
10.1	Draft	Head of Service and Operations	20/09/18

