The GDPR toolkit

Subject Access Request process (SAR)

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# Document Purpose

This document forms part of the GDPR toolkit which has been created in partnership with Black Penny Consulting. The GDPR toolkit is a self-service guide for alignment to the GDPR.

The GDPR Subject Access Request process is a template that can be used to manage the process of subject access requests.

# Introduction

Data subjects are entitled to ask for the information you hold on them through a process known as Subject Access Request (SAR).

Data subjects have the legal right to know whether you are processing any personal data about them as an individual and, if so, to be given:

* the purposes of you processing the data on them
* the categories of personal data concerned, personal or sensitive
* the recipients to whom the personal data have been or will be disclosed, in particular, recipients in third countries or international organisations
* where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period
* the existence of the right to request from the controller rectification or erasure of personal data or restriction on processing of personal data concerning the data subject or to object to such processing
* the right to lodge a complaint with a supervisory authority
* any available information as to the source if you were not the originating data collector
* the existence of automated decision-making, including profiling. Detail needs to be available on what technologies are used here and what result this has on the data subject and their data

The response to the data subject needs to be within 1 month of first receipt of the SAR.

# Responsibilities

The Executive Committee is responsible for the application and effective working of this suggested procedure.

The Executive Committee is responsible for handling all SAR’s but will need help from members within the relevant Scout Group, District or County/Area/Region, from which the SAR has been requested.

# Procedure

It is suggested that Executive Committee members follow this procedure and use the forms detailed within the steps when processing Subject Access Requests:

**Discovery**

Discovery will entail either:

* Collecting the data specified by the data subject, or
* Searching all databases and all relevant filing systems (manual files) in the Scout Group, District or County/Area/Region, including all readily available back up and archived files.

It is suggested that the Executive Committee maintains a data map that identifies where all data within the Scout Group, District or County/Area/Region is stored to make it easier and quicker when undertaking searches.

**Responding to a SAR**

The Executive Committee is responsible for reviewing all provided documents to identify whether any third parties are identified in it and for either omitting or redacting identifying third party information from the documentation or obtaining written consent from the third party for their identity to be revealed.

If the requested data falls under one of the following exemptions, it does not have to be provided:

* Crime prevention and detection
* Negotiations with the requester
* Information used for research, historical or statistical purposes
* Information covered by legal professional privilege

The information will be provided to the data subject in electronic format unless otherwise requested and all the items provided are listed on a schedule that shows the data subject’s name and the date on which the information is delivered.

In all cases care should be taken to redact all personal data or confidential information that the data subject should not see. The following [guide](https://members.scouts.org.uk/supportresources/4130) can give assistance on redaction.

# Subject Access Request (SAR) form

**SECTION 1: Details of the person completing the SAR**

|  |  |
| --- | --- |
| **Name** |  |
| **Address** |  |
| **Contact phone number** |  |
| **E-mail address** |  |
| **Signature** |  |

**SECTION 2: Is this SAR about you?**

|  |  |
| --- | --- |
| **☐** | **YES:** I am the data subject for this SAR and I have provided my identification (see below) **please go to section 4** |
| **☐** | **NO:** I am acting on behalf of the data subject. I have enclosed the identification for myself and the data subject (see below) **please go to section 3** |

Accepted identification is anything that is issued by the government that contains a photograph, such as a passport or driving licence.

**SECTION 3: Details of the data subject**

|  |  |
| --- | --- |
| **Name** |  |
| **Address** |  |
| **Contact phone number** |  |
| **Email address** |  |
| **Signature** |  |

**SECTION 4: SAR information**

Please supply the detail behind the SAR and what it is you need:

|  |
| --- |
|  |

Please return this form with the identification required to [insert name of the relevant Executive Committee member here] ……………………………………………………………...

\*The information within this form will be used exclusively for the purposes of this SAR. Once the SAR has been completed your personal data will be deleted. However, we will maintain your name in our SAR register for audit purposes.