**Procedure: Subject Access Request**

**Process Service Management**

**Owner Privacy Manager**

# Purpose and scope of procedure

1. This procedure has been designed to ensure:
   1. Any Subject Access Requests are managed by ROCC in a consistent and fair way that is compliant with GDPR requirements.

# Input to procedure

1. A formal Subject Access Request from an interested party. SAR Request Form can be used for this purpose.

# Output from procedure

1. A formal response to the requester including the requested information, and/or confirming that the required actions have been undertaken.

# Risks and safety notes

1. The Subject Access Request procedure should be adhered to in order that:
2. ROCC are able to carry out the process to meet the obligations of GDPR successfully and consistently;
3. The process should be carried out as soon as practical, in any event once the identity of the requester has been confirmed (if required) and no further information is required to complete the request and should take no longer than one month; and
4. All requests and subsequent internal and external communications should be recorded within the SAR Log.

Outline of procedure

**Procedure: Subject Access Request**

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| **Step** | **Trigger** | **Responsibility** | **Activity** |
| **1** | **A subject access request is received by ROCC** | ROCC | Inform the PrivacyManager of the request. This should be done by emailing the details to privacymanager@royaloutrigger.com. Raise an incident within the SAR Log |
| **2** | **Confirm the identity of the requester.** | Privacy Manager | Unless the request comes from a recognised source the identity of the SAR requester should be confirmed by requesting reasonable evidence to confirm it. This might be a scan of photo id, e.g. passport or driving license. |
| **3** | **Does the request contain enough information to locate the requested data?** | Privacy Manager | Based on the context of the request it may be necessary to request further details to progress the request. Promptly ask the requester for the additional information. |
| **4** | **Identify the location of the required information.** | Privacy Manager | Once the identity of the requester has been confirmed and there is no further information required then the time to respond should be within one month.  Using the Information Asset Register identify which data repositories need to be queried to locate the required data. Ensure that no records that will be provided to respond to the request are amended in response to the request.  Contact the data owners to collate the required data. |
| **5** | **Harvest the required information from the identified data repositories.** | Data owners | Each of the data repositories may need expert resource to harvest the required data. |
| **6** | **Review the collated data** | Privacy Manager | The collated data should be reveiwed considering the following:   * Does the information contain data about other people?   You will not have to provide the information unless the other people mentioned have given their consent, or if it is reasonable to provide it without their consent. Alternatively the data related to other individuals can be redacted. |
| **7** | **Provide the collated data** | Privacy Manager | The collated data should be provided to the requester considering the following:   * Can the information be provided in a permanent form?   In general the data should be provided in a permanent form, unless this is impossible. Alternatively the data can be shared over a screen.  A note should be entered in the SAR Log. |