

SOP Title Reference: **SARProcedure**

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Information Services Policies and Procedures

Subject Access Request Procedure

Handling requests for personal data

Contents

1. Scope	3
2. Responsibilities.....	3
3. Procedure	3
4. Complaints.....	4
Document Information.....	5
Document History	5

1. Scope

Under the GDPR, individuals have the right to know whether St George's University of London (SGUL) is processing their personal data, and if so what personal data we are processing and why, and the lawful basis for the processing. They also have the right to access their personal data.

This policy applies to requests from individuals regarding personal data SGUL processes about them and for which the University is the data controller.

These requests are known as Subject Access Requests.

2. Responsibilities

The Data Protection Officer is responsible for overseeing the handling of all Subject Access Requests received by the University.

The Data Protection Officer is responsible for maintaining a record of requests for personal data, including date received and date completed.

The Data Protection Officer is also responsible for ensuring this procedure is routinely reviewed and will report back to the Senior Information Risk Owner (SIRO) on any relevant issues.

3. Procedure

- 3.1 Requests should be directed to the Data Protection Officer (DPO) either by 'phone on 020 8725 0668, by email to dataprotection@sgul.ac.uk or by post to The Data Protection Officer, Information Services, St George's University of London, Tooting, London SW17 0RE.
- 3.2 Requests received elsewhere within the University must be forwarded to the Data Protection Officer immediately.
- 3.3 Requesters will be asked (but not compelled) to complete the University's Subject Access Request form in order to clarify the details of their request and provide any other information that will help to locate their data.
- 3.4 Requesters will be required to provide some form of photographic 'proof of identity', for example a passport or driving license, or for current members of the University their SGUL student / staff ID. No information will be disclosed without the requester's identity having been confirmed first.
- 3.5 Subject access requests will be completed within one month of receipt.

- 3.5.1 Where requests are 'complex' or 'numerous' the above period of compliance may be extended by a further 2 months, for example requests involving locating information from multiple sources or where the request is one of a series of requests from the same requester. In such instances the requester will be advised of the extension within the initial one month period, and the reason for the extension clearly explained.
- 3.6 In processing a subject access request the SGUL staff member responsible for that request will:
- collate information from all relevant locations within the University
 - co-ordinate the requesting of information from any external service providers / suppliers and partner organisations
 - identify any possible exemptions to disclosure
 - ensure all information is reviewed and 3rd party data redacted before disclosure
- 3.7 Copies of personal data will be provided free of charge to data subjects.
- 3.7.1 The University may decide to charge a fee for providing duplicate hard copies of information already supplied under a specific request. This fee will be based on basic admin costs involved in providing the copy.
- 3.8 Copies of personal data will be provided in an appropriate format, taking into account the preferences of the requester. Where a subject access request is made electronically, the information will be provided in electronic form, e.g. as a PDF.

4. Complaints

- 4.1 Individuals are encouraged to direct complaints regarding the handling of their request to the Data Protection Officer in the first instance, who will investigate.
- 4.2 However, if the individual prefers, or if they are unhappy with the outcome of the University's own investigation, they can direct their complaint to the ICO.

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