Data Subject Access Request Procedure

1. Purpose

This procedure outlines how the College will comply with its GDPR obligations concerning responding to a subject access request.

2. Target Audience and Staff Involved in Implementation

The Data Protection Officer (DPO) has responsibility for coordinating subject access requests (SARs).

3. Documentation

The following documents are relevant to this procedure:

- UPOL020 UniHaven Data Protection Policy Rev 1.
- UPOL023 Data Retention Policy Rev 1.
- UPOL024 UniHaven Data Security Policy Rev 1.
- UFORM026 UniHaven Data Subject Access Request Form Rev 1 (see Appendix)

4. Procedure

The SARs process can be summed up in the following key steps.

- Under the General Data Protection Regulation (GDPR) it is a right to have SARs handled in one month. If the requestor is not happy with the process, s/he also has the right to complain to the Data Protection Commission (DPC).
- Once the College has received a request in writing, the requestor identity will need to be verified so that the College can make sure the requestor is who s/he says s/he is because only the requestor can receive his/her personal data.

- The College has a lot of different services and strict information security policies in place meaning only authorised people have access to most information. The College will need to find out where the requested data is in the IT system before it can start putting the reply to the request together.

- Once it has identified where the requestor data is, the College will forward the request to the relevant SAR Decision Maker and they will search for and identify any relevant information. The College SAR decision-makers will generally be College Line Managers.

- A copy of the relevant data will be made available to the requestor where possible. If the College is unable to provide this, it will explain.

- The Decision-Maker is only legally permitted to send data that relates to the requestor. This means that the College will have to extract the relevant information and may need to redact some documents to make sure that it is not breaching the data protection rights of others.

- Normally, people are looking for something specific. The College will engage with requestors to try to find out exactly what information is being looked for. The more requestors can tell the College about the information, including dates and locations, the faster it will be sent to them.

- Once the data collection is complete, the College will send available and permitted data in a form that is retrievable by the requestor in compliance with its data protection obligations.

5. Quality Control

The Academic Director is responsible for ensuring that policies are developed and maintained, that they remain fit for purpose, that they remain in compliance with QQI guidelines, that they are updated as per agreed timetables, and that they are being implemented as intended. In the latter context, the Academic Director will inspect a sample of policies each year to check for the correct implementation and bring the findings to AC as part of the annual QA/QQI review and reporting process.

Appendix

UFORM026 Data Subject Access Request Form Rev 1

Request for access to Personal Data under the General Data Protection Regulation (GDPR) and Data Protection Acts 1988-2018.

Please complete all parts of this form in full. No fee is chargeable for requests made to access medical files, unless exceptional circumstances apply, in which case we would advise you.

Part 1 – Details of Data Subject (Your Details)

Your details (in block capitals):

Name: _____ Date of Birth _____

Surname_____

Address:_____

_____

Contact Phone Number: _____

*E-mail Address _____

*Only complete if you would like details to be securely e-mailed to you.

Part 2 – Details of Request

To assist us in locating the data you are requesting, please include as many specific details as possible concerning your interactions with us in the past.

Please tell us the relevant period or timelines involved, particular report or incident.

_____

_____

_____

_____

Part 3 - Declaration

Signature of Requester: _____

Date: _____

Please return the completed Form TO GIVE DETAILS BOTH E-MAIL ADDRESS AND ADDRESS

Thank you for completing this form. Your request will be acknowledged in the next 7 working days and details issued within 30 calendar days of receipt.

Quality Assurance Manual (QAM) Chapter 9

Document Name	**Data Subject Access Request Procedure**
Procedure Document Number	**UPRO012**
Version Reference	**Rev.1**
Document Owner	**Academic Director**
Roles with Aligned Responsibility	**CEO, Data Protection Officer**
Approved By	**Academic Council (AC)**
Approval Date	**2.3.2023**
Date Procedure Becomes Active	**1.4.2023**
Revision Cycle	**Annually**
Revision History/Amalgamation History	**Revised for text errors post programme validation**
Additional Information	**N/A**
References/ Supporting Documentation	**UDOC000 UniHaven Quality Assurance Manual Rev 2** **Statutory Quality Assurance Guidelines developed by QQI for use by all Providers (2016)** **Statutory Quality Assurance Guidelines developed by QQI for Independent/Private Providers coming to QQI on a Voluntary Basis (2016)** **The Data Protection Acts 1988 and 2003 (as amended)** **Data Protection Legislation including Article 5 guidelines on (GDPR) General Privacy Data Regulations** **UPOL020 UniHaven Data Protection Policy Rev 1** **UPOL023 UniHaven Data Retention Policy Rev 1** **UPOL024 UniHaven Data Security Policy Rev 1** **UPOL025 UniHaven Learning Analytics Policy Rev 1** **A Guide for Data Controllers – Data Protection Commissioner** **Data Protection Regulation 2018** **https://www.dataprotection.ie/docs/GDPR/1623.htm** **European Communities (Electronic Communications Networks and Services) (Privacy and Electronic Communications) Regulations 2011 (S.I. No. 336 of 2011)** **Data Protection Commissioner (www.dataprotection.ie)** **A Guide for Data Controllers (Office of the Data Protection Commissioner)** **http://www.dataprotection.ie/docs/a_guide_for_data_contollers/696.htm** **The Data Protection Acts 1988 and 2003 (as amended)**

A copy of UPOL020 Data Protection Policy Rev 1 is available on request.