



LINKS CHILDCARE POLICIES & PROCEDURES		
GDPR POLICY		
SUBJECT ACCESS REQUEST PROCEDURE		
Last Review Date: June 2023	Policy No.47C	Issued: 2018

What is a Subject Access Request (SAR)?

A SAR is a request for personal information that Links Childcare may hold about an individual. If an individual (or another individual authorised to do so on their behalf) wishes to exercise a subject access right, the request must be made in writing.

Although from time to time an individual may request details of some elements of their personal data held by telephone, formal SARs must be submitted in writing, either electronically or by post.

The purpose of a SAR is to make individuals aware of and allow them to verify the lawfulness of processing of their personal data. Under the GDPR and the current Data Protection Acts (DPA), individuals have the right to obtain confirmation as to whether personal data is being processed. If personal information is being processed, they are entitled to access the following information:

- the reasons why their data is being processed,
- the description of the personal data concerning them,
- anyone who has received or will receive their personal data, and
- details of the origin of their data if it was not collected from them.

SAR Handling - Appointment of a Designated Person

To ensure SARs are responded to in a timely and effective manner, responsibility for identification and management of all requests will be assigned to a Designated Person ("DP"). At Links Childcare the DP is Triona Barrett. If the DP is unavailable for any extended period, Links Childcare will delegate responsibility to a deputy.

Response Time

Under the GDPR, Links Childcare must respond to SARs within 30 days of receipt.

This deadline can be extended by a further two months where there are several requests, or the request is complex, but we will contact the individual within the initial 30 days of receipt, explaining why the extension is necessary, and when the information will be made available.

Provision of information

Individuals can make a formal SAR electronically/by email or in writing. When a data subject makes the request by email, the response also should be provided in email format unless otherwise requested by the data subject.

In all cases the individual's identity must be verified prior to granting access to information. Where insufficient information is provided to verify the identity of the individual and their right to access the personal data, the individual should be contacted in writing, or by phone if appropriate, to request the additional information necessary.

SAR Tracking and Response

1. On receipt of an SAR through any of the above channels, the request must be copied and forwarded to the Designated Person, where it will be recorded on file.
2. On receipt of the SAR, the Designated Person will log the nature of the SAR request and allocate responsibility for preparation and return of the response. Where the required information cannot be provided within the designated 30 day's timeframe, a letter of explanation will be issued with details of the reason for the delay, and confirmation as to the expected date when the information will be supplied. On issue of the formal response letter, the date of issue will be logged, and a copy of the material sent stored on file for future reference

Fees

Under the GDPR, a request for personal information is free unless the request is '*manifestly unfounded or excessive*'. In which case the Service can charge a '*reasonable fee*' for multiple requests. This would include both multiple requests, or requests for additional copies of the information.

As with all matters arising with respect to Data Privacy and/or the GDPR, if in doubt with regards to any aspect of a Subject Access Request - refer any questions or concerns to either the Manager or Data Controller.

Review Dates:	June 2023		
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