



## **Subject Access Request Policy**

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### **A) Aim**

You have a right, under the General Data Protection Regulation, to access the personal data we hold on you. To do so, you should make a subject access request, and this policy sets out how you should make a request, and our actions upon receiving the request.

If you have read this policy and are still not sure how you go about making a subject access request or you just need further information please call us on 0207 837 2019 mentioning that you would like to make a subject access request and someone will help you.

### **B) Definitions**

“Personal data” is any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier, including your name.

“Special categories of personal data” includes information relating to:

- a) race
- b) ethnic origin
- c) politics
- d) religion
- e) trade union membership
- f) genetics
- g) biometrics (where used for ID purposes)
- h) health
- i) sex life or
- j) sexual orientation.

### **C) Making a request**

Although subject access requests may be made verbally, we would advise that a request may be dealt with more efficiently and effectively if it is made in writing using our subject access request form. You do not have to complete the form to make a request, but it will help us to quickly identify you and the type of data that you want to look at. If you want to make a request, please e-mail the completed form to [info@youngwomenstrust.org](mailto:info@youngwomenstrust.org).

Current employees may make a request directly by email to the Corporate Services team using the subject data request form.

The subject access request form is attached to this policy.

In order to process your request we will need to take reasonable steps to verify your identity, which may involve asking for specific forms of photo ID such as a driving license or passport. This is so that we do not give anyone, other than you, access to your data.

When making a subject access request, please note that in doing so you will be checking that YWT is processing your data lawfully. If you only want certain types of data, please be as specific as possible about the information which you want access to, as this will help us in meeting your request. If we hold a large quantity of information on you, and your request covers all or most of that information, we may return to you to specify the information you want or the processing activities to which your request relates.

Requests made in relation to your data from a third party should be accompanied by evidence that the third party is able to act on your behalf. If this is not provided, we may contact the third party to ask that such evidence be forwarded before we comply with the request.

#### **D) Timescales**

Usually, we will comply with your request without delay and at the latest within one month. If we need more information either to locate the data requested or to verify your identity, we shall let you know and request the additional information as soon as possible. The one month deadline will start from the date that we receive the additional information.

Where requests are complex or numerous, we may contact you to inform you that an extension of time is required. The maximum extension period allowed is two months.

#### **E) Fee**

We will normally comply with your request at no cost. However, if the request is manifestly unfounded or excessive, or if it is repetitive, we may contact you requesting a fee. This fee must be paid in order for us to comply with the request. The fee will be determined at the relevant time and will be set at a level which is reasonable in the circumstances.

In addition, we may also charge a reasonable fee if you request further copies of the same information.

#### **F) Information you will receive**

When you make a subject access request you will receive confirmation that we are processing your personal data and a copy of the personal data we hold on you. In addition you will be informed of:

- a) whether or not your data is processed and the reasons for the processing of your data;
- b) the categories of personal data concerning you;
- c) where your data has been collected from if it was not collected from you;
- d) anyone who your personal data has been disclosed to or will be disclosed to, including anyone outside of the EEA and the safeguards utilised to ensure data security;
- e) how long your data is kept for (or how that period is decided);
- f) your rights in relation to data rectification, erasure, restriction of and objection to processing;
- g) your right to complain to the Information Commissioner if you are of the opinion that your rights have been infringed;
- h) the reasoning behind any automated decisions taken about you.

You are only entitled to see your own personal data and not information relating to other people unless we have evidence to show that you are acting on someone else's behalf.

#### **G) Circumstances in which your request may be refused**

We may refuse to deal with your subject access request if it is manifestly unfounded or excessive, or if it is repetitive. Where it is our decision to refuse your request, we will contact you without undue delay, and at the latest within one month of receipt, to inform you of this and to provide an explanation. You will be informed of your right to complain to the Information Commissioner and to a judicial remedy.

We may also refuse to deal with your request, or part of it, because of the types of information requested. For example, information which is subject to legal privilege or, in the case of employees, relates to management planning is not required to be disclosed. Where this is the case, we will inform you that your request cannot be complied with and an explanation of the reason will be provided

#### **H) Process for completing subject access requests**

1. Subject access requests however they are received will be logged by the Corporate Services team on a file held on Sharepoint
2. The Corporate Services team will also make sure that the identity of the data subject can be verified before passing the request on to the appropriate team(s) to be dealt with

3. The Corporate Services team will acknowledge receipt of the request and indicate a deadline by which a response will be received. This is generally one calendar month. For example, if we receive a request on 6<sup>th</sup> July the deadline for response will be 7 August.
4. Once the data has been downloaded or put together in the most appropriate format it should be passed back to the Corporate Services team who will check the data for completeness
5. The data controller is responsible for making sure that the data requested is collected and sent to the person who asked for it within the timescales shown above
6. Once the data has been sent and receipt acknowledged the case can be marked as complete on the log
7. A copy of the data provided will be held on Sharepoint for 1 year after the request was processed so that we can show compliance

## Request for Personal Data

under Article 15 of the General Data Protection Regulation

### A. YOUR DETAILS

<b>Surname:</b>	<b>Forename(s):</b>
<b>Former surname(s) (where relevant):</b>	
<b>Postal address:</b>	
<b>Daytime telephone:</b>	<b>Email:</b>
<b>Preferred method of receiving your personal data. Where your request is made electronically, we will try to return the information electronically unless you specify otherwise:</b>	
By email to address above <input type="checkbox"/> By post to the address above <input type="checkbox"/>	
Other method – please specify	
<b>Date of birth (for identification purposes only):</b>	
<b>Please indicate your relationship with YWT:</b>	
<input type="checkbox"/> Current staff <input type="checkbox"/> Former staff <input type="checkbox"/> Other (please specify below):	

Volunteer     Donor

**If current/former staff member, please give job title and dates:**

**If you have used one of our services, been involved as a volunteer, attended a focus group or been involved in some other way, please give us some details about your involvement with YWT and the approximate dates**

**B. DATA REQUESTED**

**Please describe the data which you are seeking as precisely as you can. Continue on a separate sheet if necessary:**

**C. SIGNATURE**

**I certify that I am the person named on this form and that I wish to be provided with the data which I have specified relating to myself under Data Protection Law, so that I am aware of, and can verify, the lawfulness of processing. I will not publish any data which is supplied to me without prior permission from YWT**

**Name or Signature:** **Date:**

**D. PROOF OF IDENTITY (not required if current staff member)**

**Please supply a photocopy (not originals) or scan/digital image (if sending by email) of one of the following (if you cannot supply any of these items, please contact the data controller at YWT)**

- **The pages which identify you in your passport.**
- **Your driver's licence.**

**Please send your form and proof of identity to: [info@youngwomenstrust.org](mailto:info@youngwomenstrust.org) or**

**Young Women's Trust**

**Unit D, 15-18 White Lion Street**

**London**

**N1 9PD**

**Further information about how your request will be handled is available on the YWT website at:**

**E. DATA PROTECTION STATEMENT**

**The data gathered in this form will be used to process your request for personal data under Data Protection Law. It will be held by YWT's data controller, and may be transferred to other parts of YWT for the purposes of verifying your identity or processing your request for data. We shall hold the information for 2 years from the date of the request**

**STAFF USE ONLY**

**Date form received:**

**Date ID received:**