

1. Purpose

This document sets out the NewstrAid Benevolent Fund (the charity) policy for responding to subject access requests (SAR's) under the GDPR (General Data Protection Regulation), which came into force in May 2018. This document explains the rights of the data subject in relation to a data subject access request and the charity's responsibilities when dealing with that request.

2. Individual Rights

An individual has the right to know what information is held about them. GDPR in the UK provides a framework to ensure that personal information is handled properly. This information must be:

- Processed fairly, lawfully and in a transparent manner
- Processed for specific, legitimate and lawful purposes
- Adequate, relevant and not excessive
- Accurate and up to date
- Not kept for longer than necessary
- Processed in line with an individual's rights
- Secure
- Not transferred other than in accordance with agreed terms and conditions

3. The charity's policy on providing information

The charity is committed to meeting all reasonable requests for access in accordance with GDPR, whilst respecting the ethos of honest, confidential feedback which forms part of the charity's reputation.

4. How do you make a subject access request?

A subject access request is a written request for personal information held about you by the charity. You have the right to see what personal information we hold about you. You are entitled to be given confirmation as to whether we hold or process your personal information, and if so you are entitled to access all your personal information as well as details of:

- The purposes for which we process your personal data
- The categories of your personal data we process
- The recipients, or categories or recipient to whom personal data has been or will be disclosed.
- How long we expect to store your data
- Where you did not give us the personal data, the source from which we collected the personal data; and
- Whether we use any automated decision making in relation to the processing of your personal data.
- You are entitled to have any mistakes in your personal data rectified, and to have the data deleted if you would no longer like us to store or process your personal data, or to request restriction of our processing of your personal data.

Subject Access Request Policy

To ensure we comply with proof of identity requirements, we require the attached form (appendix one) to be completed before we can process your request.

5. If you are not satisfied.

If you are not satisfied with how we have stored or processed your personal data, you have a right to lodge a complaint with us, by contacting “oldben@newstraid.org.uk” and/or the ICO.

6. What is personal information?

Personal data is information which relates to an individual or refers to the individual. Data refers to an individual if that individual can be identified such as by using their name, identification number, location data or factors specific to the individual such as physical, physiological, genetic, mental, economic, cultural or social identity of the individual.

7. What do we do when we receive a subject access request?

- Verifying your identity – if we have cause to doubt your identity, we will ask for information to verify it. For example, we may ask you for a piece of information held in your records that you might reasonably be expected to know. We cannot disclose personal information to anyone other than the individual in question.
- Collating information – we will gather any manual or electronically held information and identify any information provided by a third party or which identifies a third party.
- Third parties – before sharing information that relates to third parties, we will, where possible, anonymise or edit information that might affect another party’s privacy. We may also summarise information rather than provide a copy of the whole document. The GDPR requires us to provide information, not documents.

8. Issuing a response

Once any queries around the information requested have been resolved, copies of the information will be sent to you electronically wherever possible or, if this is not technically possible, by post.

9. Will we charge a fee?

If your data subject access requests are excessive or manifestly unfounded we will charge £10 to cover the administrative costs involved in dealing with your request. In extreme circumstances, we reserve the right to refuse your requests.

10. What is the timeframe for responding to subject access requests?

We have one month (30 calendar days) starting from when we received the information necessary to identify you, to identify the information you requested, and provide you with the information (or explain why we were unable to provide the information). Wherever possible, we will aim to complete the request in advance of the deadline.

Policy adopted by the board of trustees on: 13.12.18 Updated post GDPR external audit October 19

This policy was reviewed by management Jan 2023 and approved by Trustees Feb 2023..

Next review due in 2 years

Subject Access Request Policy

General Data Protection Regulations 2016 – Subject Access Request Form

The General Data Protection Regulations (GDPR) 2018 provides you, the data subject, with a right to receive a copy of the data/information we hold about you or to authorise someone to act on your behalf. Please complete this form if you wish to see your data. You will also need to provide **proof of your identity**. Your request will be processed within 30 calendar days upon receipt of a fully completed form and proof of identity.

Proof of identity:

We require proof of your identity before we can disclose personal data. Proof of your identity should include a copy of two documents such as your birth certificate, passport, driving licence, official letter addressed to you at your address e.g. bank statement, recent utilities bill or council tax bill. The documents should include your name, date of birth and current address. If you have changed your name, please supply relevant documents evidencing the change.

Administration fee:

The NewstrAid Benevolent Fund policy is not to charge for Subject Access Requests, unless they are excessive or manifestly unfounded, in which circumstances we will charge £10 to cover the administrative costs involved in dealing with your request. In extreme circumstances, we reserve the right to refuse your requests.

Section 1

Please fill in your details (the data subject). If you are not the data subject and you are applying on behalf of someone else, please fill in the details of the data subject below and not your own.

Title: Mr <input type="checkbox"/> Mrs <input type="checkbox"/> Ms <input type="checkbox"/> Miss <input type="checkbox"/> Other:
Surname / Family Name:
First name(s)/Forenames:
Date of birth:
Address:
Post code:

Previous addresses:		
Post code:		
Day time telephone number(s):		

Subject Access Request Policy

I am enclosing 2 of the following copies as proof of identity:

Birth certificate Driving licence Passport An official letter to my address

If none of these are available, please contact the NewstrAid Benevolent Fund for advice on 01279 879 569

Personal information:

If you only want to know what information is held in specific records, please indicate in the box below.

Please tell us if you know in which capacity the information is being held, together with any names or dates you may have. If you do not know the current name of the department, just tell us what you do know. If you do not know exact dates, please give the year(s) that you think might be relevant:

Details:

Employment records

If you are now, or have been employed by the NewstrAid Benevolent Fund and are seeking personal information in relation to your employment please provide details of your position and dates of employment:

Section 2

Please complete this section of the form with your details if you are acting on behalf of someone else (i.e. the data subject).

If you are **not** the data subject, but an agent appointed on their behalf, you will need to provide evidence of your identity as well as that of the data subject and proof of your right to act on their behalf.

Subject Access Request Policy

Title: Mr <input type="checkbox"/> Mrs <input type="checkbox"/> Ms <input type="checkbox"/> Miss <input type="checkbox"/> Other:
Surname / Family Name:
First name(s)/Forenames:
Date of birth:
Address:
Post code:
Day time telephone number(s):

Please provide proof of identity as detailed under section 1:

I am enclosing the following copies as proof of identity:
Birth certificate <input type="checkbox"/> Driving licence <input type="checkbox"/> Passport <input type="checkbox"/> An official letter to my address <input type="checkbox"/>
If none of these are available, please contact the NewstrAid Benevolent Fund for advice on 01279 879 569

What is your relationship to the data subject? (e.g. parent, carer, legal representative)
I am enclosing the following copy as proof of legal authorisation to act on behalf of the data subject:
Letter of authority <input type="checkbox"/> Lasting or enduring Power of Attorney <input type="checkbox"/> Evidence of parental responsibility <input type="checkbox"/> Other (give details) <input type="checkbox"/>

Data Subject Declaration:
I certify that the information provided on this form is correct to the best of my knowledge and that I am the person to whom it relates. I understand that the NewstrAid Benevolent Fund is obliged to confirm proof of identity/authority and it may be necessary to obtain further information in order to comply with this subject access request.
Name:
Signature: Date:
Or:
Authorised person - Declaration (if applicable):

Subject Access Request Policy

I confirm that I am legally authorised to act on behalf of the data subject. I understand that the NewstrAid Benevolent Fund is obliged to confirm proof of identity/authority and it may be necessary to obtain further information in order to comply with this subject access request.

Name:

Signature:

Date:

Warning: A person who unlawfully obtains or attempts to obtain data is guilty of a criminal offence as is liable to prosecution.

I wish to:

Receive the information in electronic format (some files may be too large to transmit electronically and we may have to supply in CD format)

Receive the information by post*

Collect the information in person

View a copy of the information only

Go through the information with a member of staff

*please be aware that if you wish us to post the information to you, we will take every care to ensure that it is addressed correctly. However, we cannot be held liable in the information is lost in the post or incorrectly delivered or opened by someone else in your household. Loss or incorrect delivery may cause you embarrassment or harm if the information is "sensitive".

Please send your completed form and proof of identity to:

The Chief Executive Officer
The NewstrAid Benevolent Fund
Suite 2
Thremhall Estate
Start Hill
Bishop's Stortford
CM22 7TD

The NewstrAid Benevolent Fund will retain the information provided and only share the information with those it is legally entitled to. The information will only be kept for as long as necessary and in accordance with The NewstrAid Benevolent Fund's retention policy, will be disposed of in a safe and secure manner.