



Luctonians Sports Club Ltd & Luctonians Ltd

Subject Access Request Procedure

What is Subject Access

Subject access is the right under the Data Protection Regulations for an individual to find out what personal data the Club holds about them.

Subject access is not only the right for an individual to see a copy of the information the Club holds about them but is also their right:

- to be told whether any personal data is being processed;
- to be given a description of the personal data, the reasons it is being processed, and whether it will be given to any other organisations or people;
- to be given a copy of the personal data; and
- to be given details of the source of the data (where this is available).

Subject access provides a right for the individual to see their personal data, rather than a right to see copies of documents that contain their personal data. The Club is not obliged to do this.

There are some occasions when information is exempt from subject access. This is when such information would disclose information about another individual. Information may also be exempt because of its nature or because of the effect its disclosure is likely to have. An example of this might be in respect of a safeguarding investigation.

Applying for Subject Access

If a person asks advice about subject access and how to apply for it they should be advised to ask in writing for access to their data. There is no prescribed format for such an application but must include the following information

Subjects full name, address and date of birth, Club membership ID if they are a member. (This means the Club can identify the subject – the regulations state that the Club must be satisfied the subject is who you say they are and so entitled to the information. The Club might ask for further identification information)

The Club asks that they specify if they are looking for any specific information, this will enable us to respond quicker to the request.

The Club also request that they state their preferred contact method, written/phone/email.

Application should be sent to:

The Data Protection Officer,
Luctonians Sports Club
Mortimer Park
Kingsland
Herefordshire
HR6 9SB

or email it to dpo@luctonians.co.uk



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How Luctonians will respond

Luctonians will as soon as possible acknowledge the subject access application. We then have 1 month from receipt of your application to supply the information in a suitable format.

Luctonians are able to extend the period of compliance by a further two months where requests are complex or numerous. If this is the case, we will inform the subject within one month of the receipt of the request and explain why the extension is necessary.

Luctonians will provide a copy of the information **free of charge**. However, we can charge a 'reasonable fee' when a request is manifestly unfounded or excessive, particularly if it is repetitive. Luctonians may also charge a reasonable fee to comply with requests for further copies of the same information. Our fees are based on the administrative cost of providing the information.

If for any reason Luctonians decided that your request for subject access is to be refused we will inform the subject within 1 month and state the reasons why we are refusing the request. The subject must be informed that they are able to appeal our decision either via a regulatory authority (ICO) or via the Courts.

Applying for Subject Access on behalf of a third party

A person is entitled to make a subject access request on behalf of a third party as long as they have the relevant written authority to do or are the parent or legal guardian of a child.

Luctonians must assess whether in their view, the person who they are applying on the behalf of has the capability to understand the request and the information provided and the decision could be to supply the information directly to the subject.

The Responsibilities of staff and Volunteers in respect of Subject access requests

General Data Protection Regulations make it quite clear that there is no specified format for subject access request other than in writing and making sure that the Club has satisfied its self that the subject is entitled to the data.

All Staff and Volunteers must be able to recognise a subject access request and be able to guide individuals as how to make one if asked.

Subject access request could come via social media or website enquiries. These enquiries **MUST** be forward to the Data Protection Officer **IMMEDIATELY** to be dealt with.

The Club has a 1-month time limit to respond to subject access request.

Any emails or other correspondence received from the Club's Data Protection Officer that relates to a subject access request **MUST** be responded to within 48 hours of receipt, providing full disclosure of information. This is a lawful sharing of data.

ANY DELAY OR BREACH OF THESE PROCEDURES COULD LEAD TO DISCIPLINARY ACTION.

24th April 2018