



St George Housing

SUBJECT ACCESS REQUEST POLICY

December 2023

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1. INTRODUCTION

1.1 This policy details the procedures and responses to Subject Access Requests (SAR) under the General Data Protection Regulation (EU) 2016/679 (GDPR) and the Data Protection Act 2018 (DPA) at St George Housing (SGH).

2. POLICY STATEMENT

2.1 SGH is committed to upholding individual rights in accordance with the GDPR, specifically Article 15, which grants individuals the right to access their personal information held by the Association.

3. LEGAL FRAMEWORK

3.1 The legal framework that underpins this policy takes into account the following legislation, regulation and codes of practice.

- General Data Protection Regulation (GDPR)
- Data Protection Act 2018 (DPA)

3.2 This policy complies with Regulator of Social Housing (RSH) Standards.

4. SCOPE AND OBJECTIVES

4.1 This policy This policy applies to all SARs received by SGH, aiming to:

- Respond to reasonable SARs not subject to specific exemptions.
- Verify identity securely through prescribed means.
- Retrieve, review, and release information in compliance with GDPR and DPA.
- Address errors in provided information promptly.
- Adhere to a one-month response timeframe, with potential extensions communicated.
- Assess and refuse unfounded or excessive requests based on GDPR guidelines.
- Handle objections to processing personal information and rectify inaccuracies upon request.
- Provide avenues for complaint and internal review for dissatisfied individuals.

5. ROLES AND RESPONSIBILITIES

5.1 The Data Protection Officer (DPO), Alice Agyepong

- Oversees and manages the SAR process.
- Ensures compliance with GDPR and DPA.
- Reviews internal complaints and conducts internal reviews.

Requesters:

- Submit SARs in writing, including necessary identification.
- Verify identity through prescribed means.
- Provide accurate details of the information sought.

5.2 Staff:

- Cooperate in providing necessary information for SARs.
- Alert DPO to potential third-party privacy concerns.
- Assist in verifying the identity of requesters.

6. SUBJECT ACCESS REQUEST PROCEDURES

Making a SAR

- SARs must be made in writing.
- Requesters should provide full name, address, specific information details, and two forms of identification.
- Use the provided Subject Access Request Form for convenience.

Submission of SAR:

- Send requests to SGH's Data Protection Officer, Alice Agyepong, at 182-184 Office 1574, High Street North, Eastham, London, E6 2JA or email a copy to gdpr@stgeorgehousing.co.uk

Processing Timeframe:

- SGH will process SARs in accordance with GDPR and DPA, providing a response within 1 month of receiving all relevant information.

6.2 Verification of Identity:

- Identity verification may require attending the SGH office with two forms of identification or submitting certified copies.
- Requesters making requests on behalf of others need to provide evidence of consent.

Information Retrieval:

- SGH will check for sufficient information in the initial request and request additional details if necessary.
- A thorough search of paper and electronic records will be conducted, including consultations with relevant staff.

Review and Exemptions:

- Information will be reviewed for release, taking into account potential third-party privacy concerns.
- Exemptions under the DPA will be considered, and legal advice sought if needed.

Response to Requester:

- Once information is reviewed and deemed releasable, SGH will send a permanent copy to the requester, unless agreed otherwise.

Charging Fees:

- SGH cannot charge fees for standard SARs under GDPR.
- Fees may apply for unfounded or excessive requests or for additional copies based on administrative costs.

Timeframe Extension:

- SGH has 1 month to respond to SARs, starting from the date of identity verification. Extensions may occur under certain circumstances, with timely notification.

Refusal Circumstances:

- SGH may refuse to respond to SARs if they are deemed manifestly unfounded or excessive.
- Exemptions under the DPA may also apply, such as legal privilege or crime prevention.

Error Correction:

- Requesters can request error corrections in provided information, and SGH will review and rectify inaccuracies if agreed.

Objecting to Processing:

- Requesters can object to the processing of their personal information under Article 21 of the GDPR. SGH will consider compliance with this request.

Internal Review and Complaints:

- Dissatisfied requesters can request an internal review by contacting the DPO, Alice Agyepong
- If still dissatisfied, complaints can be lodged with the Information Commissioner:
- You can only lodge a complaint with the commissioner once you have been through SGH's complaints process

7. EQUALITY IMPACT ASSESSMENT

- 7.1 In writing this policy we have carried out assessment to ensure that we are considering, equality, diversity and inclusion. Our assessments did not indicate that any group had been adversely impacted by our approach to Subject Access Requests.
- 7.2 We have also carried out a privacy impact assessment as information regarding applicants is sensitive. However, responsible information sharing plays a key role in the letting of our homes. We follow information sharing protocols with local authorities and our partners where they in place.
- 7.3 To request copies of these assessments, please contact info@stgeorgehousing.co.uk

8. RELATED INTERNAL POLICIES

- Data Protection Policy
- Data Retention Policy
- Cyber Security Policy
- Equality and Diversity Policy

9. CONSULTATION

- 9.1 This policy will be reviewed in consultation the Senior Leadership Team.

10. REVIEW AND APPROVAL

- 10.1 This policy will be reviewed at least every two years or as required to take into account changes in legislation.

Responsible officer: Company Secretary

Policy Author: Director of Governance

Policy version: V1

Date of SLT Approval: December 2023

Date the next review is due: December 2025