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| **Document: DSR-00-**Release V1.4 | **UK GDPR - Data Subject Rights Policy** |  08.02.2024 |
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**Introduction**

The UK GDPR provides for the rights of a natural person over the information that is held on them. Caldecott Fostering Ltd. are committed to the fulfilment of those rights as a Data Controller, Joint Controller and Data Processor within the timeframes prescribed by the UK Data Protection Regulator – The Information Commissioners Office. As the fulfilment of these rights are bound by time, it is necessary to have established procedures in place to minimise the time required to complete the associated tasks and to provide staff members with a clear route should they be in receipt of a request.

It is widely understood that a data subject rights request does not require formality in its own right. If a data subject states, even in simplistic terms, that they require ‘all the information held on me’, then they will be deemed to have made a valid request. This does not mean that you cannot seek clarification, but it does mean that the clock has started ticking.

**Data Subject Rights - Scope**

Not all data subject rights require active procedures in reaction to a request, for example the ‘right to be informed’ will be managed by the implementation of our privacy notices whereas the ‘right of access’ will require activity and effort by the data controlling organisation. The table below lists the rights and identifies those in scope for procedural documentation. The time frames identified in the table are the stated completion times at the time of writing, however, there may be some level of flexibility where requests can be completed partially and require additional time, for example the ‘right to object’. The Data Controller or Data Protection Officer will be able to provide advice and guidance in this regard.

**Current Guidance**

In all circumstances, those responsible for satisfying the rights of Data Subjects must be familiar with the latest advice and guidance that is provided by the Regulator – The Information Commissioners Office (ICO). At the time of writing, the most current information provided by the ICO can be found on their website: [www.ico.org.uk](http://www.ico.org.uk)

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| **Rights of the Data Subject** | **Procedure?** | **Time Frame\*** |
|  |  |  |
| The right to be informed | N | N/A |
| The right of access | Y | 28 days |
| The right to rectification | Y | 28 days |
| The right to erasure | Y | 28 days |
| The right to restrict processing | Y | 28 days |
| The right to data portability | Y | 28 days |
| The right to object | Y | 28 days |
| Rights in relation to automated decision making and profiling | N | N/A |

*\*please note that the timeframes stated are at the outer limits of the requirement and that all data subject requests should be satisfied as soon as reasonably possible.28 days is stated, to represent the shortest possible month.*

The table shows that ‘the right to be informed’ and the ‘rights in relation to automated decision making and profiling’ are subject to the data control and processing environment. This means that the rights need to be understood and protected by the methods used in data management and data privacy policies. There are six rights that are in scope for formal process.

**Using an Established Framework**

Working to a methodology within the organisation enhances our performance in task completion. Like most tasks, data subject requests are largely formulaic. The data under management is held in a data map. The data map aids the location of the data that is needed in relation to each of the data subject requests.

The rights of the data subjects must be made clear to them. These rights and the route to exercising those rights must be made available to them on publicly accessible media, for example in the privacy notice/statement on our website. In addition, where contracts, agreements, electronic forms etc. are used to collect information, the data subject should be directed to the publication of data subject rights or have them available at the point of data collection.

When a data subject access or other rights request is received, we will maintain a register to track the core details and time frames in which we will work to satisfy the requests. The procedures and associated documents referenced here are produced to help streamline processes.

**List of documentation:**

**DSR-00 UK GDPR** - Data Subject Rights Policy (*this document*)

**DSR-01 UK GDPR** – The right of access

**DSR-02 UK GDPR** – The right to rectification

**DSR-03 UK GDPR -** The right to erasure

**DSR-04 UK GDPR -** The right to restrict processing

**DSR-05 UK GDPR -** The right to data portability

**DSR-06 UK GDPR -** The right to object

**DSR-07 UK GDPR** - Glossary

**Document Revision Control**

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| **Revision No**  | **Date** | **Description** | **By** |
| 1.o | 10/12/2018 | Created template and released 12 Dec 2018. Document suite from DSR-00 to DSR-07. | **Guardian Saints** |
| 1.1 | 8/1/2020 | Annual review, minor changes to simplify language applied to all document suite from DSR-00 to DSR-07. | **Guardian Saints**  |
| 1.1 | 15/1/2020 | Document revision table added at end of document DSR-00 GDPR to track the full document suite (DSR-00 to DSR-07). Version number updated to 1.1 | **Guardian Saints** |
| 1.2 | 7/2/2021 | Annual review – minor changes - GDPR to UK GDPR  | **Guardian Saints** |
| 1.2.1 | 7/2/2022 | Annual Review – no changes | **Guardian Saints** |
| 1.3 | 24/2/2023 | Annual review – Aesthetic changes and formatting | **Guardian Saints** |
| 1.4 | 16/1/2024 | General review – minor language clarification | **Guardian Saints** |