



The Process for handling a Subject Access Request

This document describes the process of triage for a request arriving from a data subject, for access to his or her information as held by the College. While this outlines a clear and logical process, there will always be some room for judgement and careful analysis in the event that such an exercise is undertaken, and the staff member should always refer to the Data Processing Officer (dpo@ssho.ox.ac.uk) for final decision.

1. Is this request legitimately classed as a 'subject access request'?

Any written request by an individual asking for their personal information is a subject access request. You can choose to deal with it in one of two ways: as a routine enquiry, or more formally. If you can, treat requests that are easily dealt with as routine matters, in the normal course of business.

2. By what means have you ascertained and guaranteed the identity of the requester?

If you have received a written request for information, is it accompanied by proper identifying information?

3. Do you need clarification from the requester on exactly what their request is about?

If there is any lack of clarity, this should be cleared up straight away to avoid the risk of over- or under-reporting.

4. Will handing over the data, mean releasing data on any other person? If so, you should follow up with the other individuals concerned before taking action.

You will not have to supply the information unless the other people mentioned have given their consent for the disclosure, or it is reasonable to supply the information without their consent. If you decide not to disclose the other people's information, you should still disclose as much information as possible by redacting the references to them - this is the only circumstance where you can legitimately redact data prior to release

5. Are you obliged to hand over the information?

There are some circumstances where there is no such obligation - thus the following relationships would generally carry with them a duty of complete confidence in relation to information disclosed.

-Medical (doctor and patient)

-Employment (employer and employee)



-Legal (solicitor and client)

-Financial (bank and customer)

-Caring (counsellor and client)

6. Is the data in a comprehensible form?

If there are codes, arcane language or other obscure elements in the data, then you must make sure you explain the codes or provide a key so that the information can be understood.

7. Having worked through the above checklist, you must then provide a copy of the information *in a permanent form* unless the individual agrees otherwise.

Document version 1.0, May 2018