



# Luctonians Sports Club

## 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;
- their right 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;
- their right to be given a copy of the personal data and
- their right 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 affect 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 it must include the following information:

- The subject's full name
- The subject's date of birth
- The subject's full address
- The subject's Club membership ID if they are a member

This enablesthe Club to identify the subject. The regulations state that the Club must be satisfied the subject is who they say they are and therefore entitled to the information. The Club might ask for further identification.

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, in writing/by phone/by email.

Applications should be sent to:

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

or emailed to [dpo@luctonians.co.uk](mailto:dpo@luctonians.co.uk)

Cont...



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## **How Luctonians will respond**

Luctonians will acknowledge the subject access application as soon as possible. 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 may 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 will be based on the administrative cost of providing the information.

If for any reason Luctonians decide that the 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 (the Information Commissioner's Office) 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 so 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 itself 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 internal emails or other correspondence received FROM the Club's Data Protection Officer that relate to subject access requests **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.**

**Any questions about this Procedure should be directed to the Club's Data Protection Officer:**  
**[dpo@luctonians.co.uk](mailto:dpo@luctonians.co.uk)**

Last Reviewed on 19<sup>th</sup> April 2021