

Subject Access Request Policy

1. Overview

This policy sets out The Institute's approach to subject access requests made under the Data Protection Act 1988 (DPA). A subject access request (SAR) is a written request for personal information about the data subject. The request should be made on [The Institute SAR form](#).

2. Making a Subject Access Request

Subject access requests should be made by completing The Institute "Subject Access Request" form. Full completed forms should be sent to:

The Institute of Customer Service
Bridge House
4 Borough High St
London SE1 9QQ

Requests can also be emailed to: membership@icsmail.co.uk - please put SAR in the subject title.

A person making a SAR should ensure that full and specific details of the information required are included in the form. SAR forms should be fully completed, incomplete forms may not be considered.

3. Process - What do we do when we receive a subject access request?

Step 1 - Confirmation of identity

The Institute will check that the person making the subject access request is either the data subject or the person authorised to make the subject access request on behalf of the data subject. This will be done by asking the person making the request a number of identity related questions, obtaining proof of address or another piece of personal information held by The Institute. If the person making the request is applying on behalf of the data subject The Institute will require written consent from the data subject in order to release the information.

Step 2 - Clarification and provision

The Institute will (where necessary) clarify the information required with the person making the request within 1 week of receipt of the request. Once it is clear what information has been requested, copies of that information will be made and sent to the person making the request. Where the information requested is voluminous, The Institute reserves the right to agree an alternative method of providing the information with the person making the request. This may be providing the information electronically or allowing the individual to view the information at The Institute's offices.

4. Fee

The Institute will not charge a fee for subject access requests.

5. Timescale

The Institute will respond to subject access requests within 30 calendar days of the request being received. Within this 30 day period The Institute will:

- Confirm identity of the person making the request –within 1 week of the request being received
- Clarify and confirm the information requested – within 1 week of the request being received
- Provide the information or provide an explanation as to why The Institute is unable to provide the information - within 30 days of the request being received.

6. Subject Access Request Refusal

The Institute may not grant access to personal data where an exemption applies. This may include requests for information which is:

- Covered by legal professional privilege
- Clarify and confirm the information requested - within 1 week of the request being received
- Used for research, historical and statistical purposes
- A reference given or received by The Institute

Where information requested contains the personal details of persons other than the person making the subject access request, The Institute will anonymise such details unless the information is already in the public domain.

7. Factual Errors

Where information is identified as incorrect as a result of a data subject access request The Institute will consider whether the information incorrect and if so, will correct it and destroy the original inaccurate information. Where it is not possible to confirm the accuracy or inaccuracy of information, a log of the request to alter the information will be made along with details of the requested correction.

8. Review and ownership

Name of policy	Subject Access Request Policy
Version number	1.0
Effective date	August 2017
Date of issue	August 2017
Date of next review	
Notable changes from previous version	N/A
Policy owner	Head of Operations