



Education & Skills
Funding Agency



Subject Access Request Policy



1. Introduction

Skills People Group consists of the following companies.

- *Construction Skills People*

The company is committed to comply with the General Data Protection Regulation (GDPR) which forms part of data protection regime in the UK, together with the new Data Protection Act 2018 (DPA 2018) and the main provisions that apply, like GDPR, from the 25th May 2018.

2. Overview

GDPR introduced the '**right to access**' from the 25th May 2018. The right to access gives an individual also referred to as a '**data subject**' the right to obtain a copy of their '**personal data**' as well as other supplementary information.

An individual is only entitled to request their own personal data, and not to information relating to another person without their consent.

Individuals have the right to obtain the following:

- *confirmation that we are processing their personal data;*
- *a copy of their personal data; and*
- *other supplementary information*

3. Purpose

The purpose of this policy is to provide individuals information about how they can exercise their right to access their personal data. This is commonly known as making a 'subject access request'.

4. Subject Access Requests

A Subject Access Request form is available (page 5, appendix a) however, a request is still valid if it is submitted by other means, therefore to ensure that we comply with legislation, requests can be made by letter, a standard email or verbally using the details outlined below:

- **Email:** quality@skillspeoplegroup.com
- **Letter:** Skills People Group, Data Protection Officer (Quality Team), Unit 1, The Bridge Business Centre, Chesterfield, S41 9FG
- **Telephone:** 01246 589444

GDPR does not prevent an individual making a subject access request via a third party. Often, this will be a solicitor acting on behalf of a client, but it could simply be that an individual feels comfortable allowing someone else to act for them. In these cases, we will request consent prior to disclosing any personal information.

If we have doubts about the identity of the person making the request, we will request additional information. However, we will only request information necessary to confirm identity. The period for responding to the request begins on receipt of the additional information requested.

5. Records

Records of subject access requests will be logged and tracked by the Quality Team. Personal information will be kept secure and only shared where the law allows this and in compliance with Data Protection Legislation.

6. Response Time

On receipt of the request we will act on the subject access request without delay and respond within one calendar month of receipt. 'Day one' counts as the day of receipt – for example, a SAR received on 3rd September should be responded to by 3rd October.

We can extend the time to respond by a further two months if the request is complex or we have received a number of requests from the individual. In this instance, we will inform the individual within one month of receiving their request to explain why the extension is necessary.

7. Data Format

We endeavor to provide information using the method requested in a concise, transparent, intelligible and easily accessible format using clear and plain language. If an individual makes a request electronically, the company will provide the information in a commonly used electronic format, unless the individual requests otherwise.

8. Fee

In most cases there is no fee charged to comply with subject access requests.

However, we may charge a "reasonable fee" for the administrative costs of complying with the request if:

- *It is manifestly unfounded or excessive; or*
- *an individual requests further copies of their data following a request.*

If the company intend to charge a fee the individual will contact the individual promptly and may not comply with the request until the fee is received.

Alternatively, the request may be refused to comply with a manifestly unfounded or excessive request. For further information refer to <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-of-access/>

9. Complaints

If you are dissatisfied with how we have handled your request, in the first instance, you should make a complaint to:

- **Email:** complaints@skillspeoplegroup.com
- **Letter:** Skills People Group, (Quality Team), Unit 1, The Bridge Business Centre, Chesterfield, S41 9FG

If you remain dissatisfied you have the right to make a complaint to the Information Commissioners Office (ICO), its website is <https://ico.org.uk/> or contact number is 0303 123 1113 alternatively, you can contact another supervisor authority.

This policy has been produced using information within the 'Guide to General Data Protection Regulation' (GDPR) located on the Information Commissioners Office (ICO) website: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-of-access/>

For the attention of the Data Protection Officer

Skills People Group, (Quality Team), Unit 1, The Bridge Business Centre, Chesterfield, S41 9FG

Data Subject Access Request Form (Personal Data Request)			
Forename:		Surname:	
Full Postal Address:			
		Postcode:	
Contact Details:			
Outline specific details of the data that you are seeking to access <i>*provide as much details as possible</i>			
What is the reason for your request?			
Declaration - I confirm that I am the 'data subject' named above and I am requesting access to my own personal data.			
Data subject signature		Date of request	
Declaration - I confirm that I am the 'data subject' named above and I give my permission for the person named below access to my personal data using the details outlined within my request.			
Name of representative		Organisation	
Data subject signature		Date of request	
Internal use only		Log Number	

Document Control

Date of change	Version	Overview of amendment	Amended by / Job title	Approved by	Approval date
21-08-18	1	Policy created	Julie Lawton (Quality Manager)	A Warham	16-10-18
06-09-19	2	Policy revision. <ul style="list-style-type: none"> Page 3 section 6 response time - 'Day one 'of a SAR is now the day of receipt. (ICO update August 2019) Page 3 – section 8 – the company may change a 'reasonable fee' for manifestly unfounded or excessive requests. 	Julie Lawton (Quality Manager)	A Warham (Director) SMT meeting 9/9/19	09-09-19
11-12-20	3	Full policy revision	Sacha McCarthy (Head of Quality & Performance)	SMT	11-12-20
29-11-21	4	Policy review. Change to contact details on section 4 – subject access requests.	Brendan Knowles (Head of Quality & Performance)	Brendan Knowles (Head of Quality & Performance)	29-11-21
19-04-23	5	Full annual policy review Introduction - Removed companies from Skills People Group	Brendan Knowles (Head of Quality & Performance)	Sacha McCarthy (Director of Quality & Performance)	19-04-23