



**SCOTTISH
ROWING**



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Subject Access Request Procedure

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Scottish Rowing Limited
Registered Office: 366 Hamilton Road, Motherwell, Lanarkshire ML1 3ED
A Company Limited by Guarantee, Registered in Scotland No. SC357505



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Under GDPR, Data Subjects have the right to make a Subject Access Request (“SAR”). SARs allow individuals to request access to their personal data processed by Scottish Rowing.

Making a Request

SARs are to be made using the Subject Access Request Record Form, as contained in Appendix A. The form must be completed in full by the Data Subject.

Fees

1. Scottish Rowing must provide the information requested free of charge. However, a fee may be charged when the request made is ‘manifestly unfounded or excessive, and especially, if the request is repetitive’. The fee charged must be based on the administrative costs incurred for processing the SAR.
2. The Data Subject must provide Scottish Rowing with evidence of their identity, in the form of a current passport or driving license, and the signature on the identity must be cross-checked to that on the Subject Access Request Record Form. In addition to this, the Data Subject may also be asked to provide proof of their address by way of an up to date bank statement, utility bill or Council tax letter.
3. If an individual wishes to make a third-party request on the Data Subject’s behalf, the individual should provide details his/her identity, the Data Subject’s identity, the name and contact information and evidence of the individual’s legal authority to act on the Data Subject’s behalf, for example, written consent signed by the Data Subject, a certified copy of a Power of Attorney or evidence of parental responsibility if the data subject is a child.

How to Respond to a Subject Access Request

4. All SARs made will be dealt with by the Chief Operating Officer (“COO”). Scottish Rowing staff may assist by way of providing appropriate paperwork where necessary.

Time Limit to Comply

5. The information requested must be provided within one month of receipt of the request. This period may be extended by a further two months, to cover instances where requests made are either onerous or complex. If the compliance time period is to be extended, the individual making the request must be informed, and reasons explaining the extension must be given.

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Procedure

6. When a Data Subject makes a SAR, Scottish Rowing shall take the following steps:
 - a. Once received, the SAR application is immediately forwarded to the COO, who will ensure that the requested data is collected within the specified time frame.
 - b. The COO will log the request on the SAR spreadsheet, confirm the identity of the data subject, issue an acknowledgement of the SAR to the Data Subject, and a SAR case file will be opened on the system for the individual.
 - c. The COO will firstly liaise with the relevant staff to decide if the information requested is actually held by Scottish Rowing or will ask the Data Subject for clarification, if the original request is not clear. It is vital that advice and assistance is offered to Data Subjects to help both parties. It will also help Scottish Rowing staff identify and locate the correct information as swiftly as possible (by searching databases, systems, applications and other places where the personal data which are the subject of the request may be held).
7. Once the information has been collated, the COO will consider the content of the information to establish whether any exemptions apply. If not, then the information can be released to the applicant, and a copy of the response will be held on the case file.
8. If personal data of the data subject are being processed, the COO shall provide the data subject with the following information in a concise, transparent, intelligible and easily accessible form, using clear and plain language, in writing or by other (including electronic) means:
 - the purposes of the processing;
 - the categories of personal data concerned (for example, contact details or bank account information);
 - the recipients or categories of recipient to whom the personal data have been or will be disclosed;

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- where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
 - the existence of the right to request rectification or erasure of personal data or restriction of processing of personal data or to object to such processing;
 - the right to lodge a complaint with the ICO;
 - where the personal data is not collected from the data subject, any available information as to its source;
 - the existence of automated decision-making and meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject; and
 - where personal data are transferred outside the EU, details of the appropriate safeguards to protect the personal data.
9. The COO shall also, unless there is an exemption, provide the data subject with a copy of the personal data processed by us in a commonly used electronic form (unless the data subject either did not make the request by electronic means or has specifically requested not to be provided with the copy in electronic form).
10. If an absolute exemption applies, then Scottish Rowing would automatically not disclose the information and the COO will notify the applicant of our decision. Absolute Exemptions can be found in Appendix B.
11. If we are not going to respond to the SAR we shall inform the data subject of the reason(s) for not taking action the information is not held by Scottish Rowing, the COO will advise the Data Subject in writing that Scottish Rowing do not hold the information (and refer the Data Subject to another organisation, if appropriate), and of the possibility of lodging a complaint with the ICO.

Requests from children

12. The COO will review subject access requests from a child. Before responding to a SAR of the child data subject the COO will consider their ability to making the request by adequately explaining any implications of sharing their personal data, etc..

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Third Party Disclosure

1. The COO shall review all documents that have been provided to identify whether any third parties are present in it, and either remove the identifying third party information from the documentation or obtain written consent from the third party for their identity to be revealed.

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Appendix A

<p>Under the Data Protection Legislation , you have a right to access to personal data relevant to you and processed by Scottish Rowing. It is called a Subject Access Request.</p> <p>If you wish to access data about someone else then you will require their written consent, which you must make available to us. You may be committing an offence to seek personal data about other individuals without their consent.</p> <p>Please complete this form and return c/o the Administrator, Scottish Rowing, 366, Hamilton Road, Motherwell, ML1 3ED or email it to dp@scottish-rowing.org.uk</p>	
Full Name:	
Home Address:	
Date of birth:	
Telephone Number:	
E-mail address:	
Position within Scottish Rowing (if applicable):	Account SR Membership Number: (if applicable)
Information requested	
<p>Please state the information required in detail, along with any relevant dates that apply, e.g. 'training records from the dates [] to [].</p> <p>Please also provide details of any reference numbers that will assist us to locate the information you require.</p>	
State proof of identity enclosed: (i.e. driving license, passport, birth certificate)	
State proof of address enclosed: (i.e. utility bill, council tax letter, bank statement)	
<p>Declaration:</p> <p>I request access to the personal data indicated above and have enclosed the required 2 proofs of identification.</p> <p>I confirm that I am the Data Subject and am not acting on behalf of someone else.</p>	
Signed	Date

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This section to be completed by persons other than the Data Subject, and acting on behalf of the Data Subject:	
Declaration: I confirm that I am acting on behalf of the data subject and have submitted proof of my identity and authority to receive this data:	
Name	
Address	
Signed	Date

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