



## **Subject Access Requests**

Individuals have a right to access their personal data and supplementary information. This right allows data subjects to be aware of and verify the lawfulness of the processing. Data subjects are entitled to:

- confirmation that their data is being processed;
- access to their personal data;
- other supplementary information, such as who the data is shared with.

A subject access request is simply a written request made by, or on behalf of, an individual. Please see below for further information on the following:

- Making a subject access request (a request relating to personal data of which you are the data subject)
- Making a third-party request for personal data (a request relating to personal data of which someone else is the data subject)

### **How do I Make a Subject Access Request?**

A subject access request must be made in writing either physically or electronically. Proof of identification must also be enclosed, comprising a copy of an official document containing photographic identification such as a copy of your passport or driving licence. There is template as per [appendix one](#) at the foot of this document. This template is not compulsory, however, may be useful to you in completing a subject access request, this can be submitted electronically to [d.longstaff@ulster.ac.uk](mailto:d.longstaff@ulster.ac.uk) or physically to the following address:

*CEO and Data Protection Officer  
UUSU  
c/o University of Ulster  
Room 11H03  
Jordanstown Campus  
Shore Road  
Newtownabbey  
BT37 0QB*

The Students' Union will only begin to process a request once it is in receipt of full ID.

### **What Happens Once I Have Submitted a Request?**

UUSU will send you an acknowledgement of the request. If we need any clarification, or if proof of ID is missing, we will contact you as soon as possible. Once we are in receipt of a clear request and proof of ID we will begin to locate and collate the relevant personal data.

### **What Information Will I Receive?**

The subject access request allows individuals the right to access personal data of which they are the subject. It does not provide the right to access entire documents if the documents do not fully comprise the personal data of the individual. Therefore, in response to a subject access request, an individual may receive partial or redacted documents.

### **Can I access the personal data of other individuals?**

An individual only has the right to access personal data of which they are the subject and there is no right of access to the personal data of friends or family. However, there are some instances in which a

request made on behalf of another individual or for a specific purpose (such as the detection or prevention of crime) will be considered. Please see the section 'Making a third-party request for personal data' for further information.

#### **When will I receive a response to my request?**

Under data protection legislation, UUSU must respond within one month of receiving a request and proof of ID unless the request is particularly complex, in which case the deadline may be extended by a further two months. Where UUSU needs to extend a deadline, we will write to inform the requestor of this.

#### **How will I receive copies of personal data in response to my request?**

Copies of personal data will normally be sent either electronically (by email attachment, using password protection and encryption) or in hard copy (by the Royal Mail's 'Signed For' service). If you prefer, you can request that we provide personal data to you orally, but we will only do so if we are able to verify your identity first.

#### **What if I am dissatisfied with the response?**

If you are dissatisfied with the way in which your subject access request has been processed or dissatisfied with the response that you have been given, please write to UUSU's Data Protection Officer in the first instance via [d.longstaff@ulster.ac.uk](mailto:d.longstaff@ulster.ac.uk) so that UUSU is provided with the opportunity to review the matter and respond to your concerns.

You can also ask the Information Commissioner's Office (ICO) to carry out an assessment to see whether it is likely or unlikely that UUSU has responded properly. Full particulars of the GDPR including contact details may be found at: <https://ico.org.uk/make-a-complaint/>.

#### **Making a third-party request for personal data?**

There are some circumstances under which UUSU will consider a request for access to personal data on behalf of another individual, or a request for access to personal data of another individual without their consent. These are:

- The requestor is the parent of a child under the age of 12
- The requestor has the written permission to make a request on behalf of another individual
- The requestor has Power of Attorney or an order from the Court of Protection to act on behalf of another individual
- UUSU believes that it is in the best interests of an individual who does not have the capacity to make a request themselves
- UUSU deems that release can be justified under crime and taxation provisions.

In these circumstances UUSU may seek further information from the requestor and the ICO to help determine whether we are willing to release any personal data.

#### **Requesting access to personal data on behalf of a child?**

Children aged 13 and above are generally deemed mature enough to make decisions about the processing of their personal data and would normally be expected to submit a subject access request themselves. Where a parent of a child over the age of 13 submits a subject access request on the child's behalf, UUSU may contact the child to request their consent to the release of the personal data or require the parent to provide written consent from the child.

A parent has the right to request access to their child's personal data, where the child is under 13 years old. UUSU will decide whether it is in the best interests of the child to make the disclosure. Please follow the subject access request process in [appendix one](#), submitting a copy of a form of ID for yourself and your child.

### **A request to personal data made on behalf of another adult?**

A request for access to personal data made on behalf of an adult will need to be accompanied by a signed letter from the data subject which contains consent to the release of all or specific personal data to the requestor. Such requests are typically made by solicitors acting on behalf of a client.

A request for access to personal data made on behalf of an adult who does not have the capacity to make a request themselves will need to be accompanied by proof that the requestor has the authority to act on behalf of the data subject, such as through Power of Attorney or an order from the Court of Protection. Where authority is not provided, UUSU will consider on a case by case basis whether release of the personal data requested is in the best interests of the data subject. Please follow the subject access request process above, submitting a copy of a form of ID for yourself and the data subject and proof of your authority to act on behalf of the data subject.

### **A request for personal data for the purposes of law enforcement**

The Data Protection Act 1998 contains some exemptions (sections 28 and 29) that permit UUSU to release personal data for the purpose of law enforcement:

- Safeguarding national security (section 28)
- The prevention or detection of crime, the apprehension or prosecution of offenders or the assessment or collection of any tax or duty or of any imposition of a similar nature (section 29).

A request for the release of personal data under section 28 or 29 would be typically made by a police force, the Department for Work and Pensions, a local authority or the Border and Immigration Agency. UUSU is not obliged to release personal data unless it is satisfied that it is reasonable to do so. Under these exemptions, personal data may be released without the consent of the data subject and outside of the purpose for which the personal data was originally collected.

A request for release of personal data for the purpose of law enforcement should be submitted using the requesting organisation's own form for that purpose. Police forces, for example, use standard forms as per guidance issued by the relevant Governing Body. The form should give full details of the personal data requested, a full explanation of the reason for the request and should be counter-signed by a senior officer of the organisation. Completed forms should be emailed to [d.longstaff@ulster.ac.uk](mailto:d.longstaff@ulster.ac.uk).

Requests will be acknowledged, and a full response sent as soon as possible.

## **Appendix 1: Subject Access Request Form**

### **1. Personal Details of Data Subject**

This should be completed with the details of whom the request is pertaining to.

Full Name:	
Address:	
Telephone number:	Faculty/School:
Student number/staff payroll number (if applicable):	
Name of course (if applicable):	
Email address:	

### **2. Alternative Contact Details (third parties only)**

Only complete this section if you are not the data subject, i.e. you are requesting information on behalf of another person.

Title:	Forename(s):	Surname:
Address:	Telephone number:	
	Email address:	
Relationship to data subject/authority for making request:		

### 3. Records Required

Please complete all sections by ticking the category/categories into which your enquiry falls:

Category	
Sports Associations or Community Associations	
Student records	
Disciplinary records	
Grievance records	
Other HR related documents	
Health and medical matters	
Political, religious or trade union information	
Personal details, e.g. name, address and date of birth	
Other (please specify or describe if possible)	

Please describe the information you seek in as much detail as possible. This will help us to identify the information you require.

#### 4. Sections / Departments to Search

Please tick below which (if any) of the following sections/departments the documents you are seeking may be found or which you would like us to specifically search.

Service / Department	Search
Volunteering or Office Holding	
Your Community or Sports Association	
Human Resources	
Student & Representation Services	
Commercial Services	
Finance	
IT Services	
Marketing	
Facilities	
Other(s) (please specify):	

#### 5. Identity

If you are requesting personal data of which you are the subject you must supply:

- a photocopy/scan of proof of your identity with this form, such as passport, driving licence or University ID card.

If you are requesting personal data on behalf of a subject you must describe your relationship to the subject and supply:

- written signed authority of the subject, and,
- a photocopy of proof of the subject's identity with this form, such as passport, driving licence or University ID card.

#### 6. Declaration

I certify the information provided in this form is accurate to the best of my knowledge. I accept that UUSU will take reasonable steps to establish identity prior to release of personal data.

I request that The Students' Union at UUSU provide me with a copy of personal data relating to the subject named in Section 1 of this form.

I enclose the following:

- A photocopy of the data subject's proof of identity;
- Written and signed authority of the data subject (third parties only).

Signed:	
Printed Name:	Date:

Please return the completed form either via e-mail marked clearly "Data Subject Access Request" to the following e-mail address: [d.longstaff@ulster.ac.uk](mailto:d.longstaff@ulster.ac.uk).

Alternatively, send by post to the following address:

*CEO and Data Protection Officer  
UUSU  
c/o University of Ulster  
Room 11H03  
Jordanstown Campus  
Shore Road  
Newtownabbey  
BT37 0QB*