

Document Title	Subject Access Requests
Policy Area	Area 8: Information and Data Management
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Applies to	<input checked="" type="checkbox"/> All <input type="checkbox"/> Specific
	<input type="checkbox"/> Staff only <input type="checkbox"/> Learners only <input checked="" type="checkbox"/> Staff and Learners

Document Owner	Managing Director
Approved by	Board of Directors

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Related legislation, policies, procedures, guidelines and local protocols	<p>This policy has been designed with due regard to the following:</p> <ul style="list-style-type: none"> - Core Statutory Quality Assurance Guidelines (2016), QQI - Sector Specific Independent/Private Statutory Quality Assurance Guidelines (2016), QQI - Qualifications and Quality Assurance (Education and Training) Act, 2012 - European Association for Quality Assurance in Higher Education (ENQA), et. al (2015), Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) - General Data Protection Regulation (GDPR), 2016 - Data Protection Act (2018)
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1. INTRODUCTION

Under Article 15 of the GDPR (2016), an individual has the right to obtain from the data controller, confirmation as to whether personal data concerning them is being processed. SQT are committed to upholding the rights of individuals and have dedicated processes in place for providing access to personal information. Where requested in writing, SQT will provide the following information to a data subject: -

- the purposes of the processing.
- the categories of personal data concerned.
- the recipient(s) or categories of recipient(s) to whom the personal data have been or will be disclosed.
- If the data has been transferred to a third country or international organisation(s).
- the envisaged period for which the personal data will be stored.
- where the personal data was not collected directly from the individual, any available information as to its source.

2. PURPOSE

The purpose of this policy is to ensure that the organisation complies with the subject access request provisions of the Data Protection Act (2018) and to enable individuals to submit data access requests, where required.

3. SCOPE/APPLICATION

All personal data processed by SQT is within the scope of this policy. Data subjects are entitled to obtain:

- Confirmation as to whether SQT is processing any personal data about that individual;
- Access to their personal data;
- Any related information;

4. RESPONSIBILITY

The following responsibilities apply with respect to the implementation of this policy:

- Relevant administrative staff are involved in collating the required information.
- The Senior Management Team is responsible for approving the information sent to the data subject.
- The Managing Director is responsible for ensuring site wide compliance of this policy.

5. PROCEDURE FOR MANAGING SUBJECT ACCESS REQUESTS

1. In order to exercise the right to access personal data, a data subject should submit their request by email to info@sqt-training.com, where it's recorded and the date of receipt noted. The data subject should be as specific as possible about the information being sought, in order to ensure that the correct information is accessed, as efficiently as possible.
2. Where a request is received through other means, the request is immediately forwarded to the Director of Quality and Academic Affairs. In the case of absence of the Director of Quality and Academic Affairs, the matter is forwarded to the Managing Director.
3. Upon receipt of an access request, the Director of Quality and Academic Affairs will determine whether further information, including proof of identity or authority, is required. SQT will advise if this is necessary.
4. An individual seeking amendments to their personal data must specify what data is incorrect and provide the correct version of same. Evidence to support the required change of personal information may be required in some cases, e.g. change of name. SQT will advise if this is necessary.
5. Once the Director of Quality and Academic Affairs is satisfied that all information required is available, the data access request will be processed. Where this requires assistance from other individuals, they will be notified of the information request and the timeframe in which they must provide it. The data will be provided to the data subject within 30 days of the receipt of a valid request. A fee will not be applied. If it is not possible to supply the data within this timescale, the data subject should be contacted with an explanation of the cause of the delay and informed of when they can expect to receive the data.
6. The Director of Quality and Academic Affairs compiles the response to the data access request, including the provision of supplementary information.
7. This draft response is reviewed by the Managing Director prior to submitting to the data subject.
8. The final response will be issued to the data subject, normally in electronic format, except where specified otherwise or where this is not feasible and practicable. A copy of the response will be retained by SQT for a period of 12 months.
9. The data subject will be notified of their right to correction, right to erasure, right to withdraw consent and right to complain to the supervisory authority (Office of the Data Protection Commissioner), www.dataprotection.ie

6. POLICY MONITORING

Responsibility	Frequency	Methods
Managing Director	Per QA audit schedule	- Review of documentation as set out in QAP2-1: Ongoing Review and Update of QA Documents.
Managing Director	Annual	- Review of legislative updates. - Review of data subject requests.

7. DOCUMENT CONTROL

Version No	Approval Date	Description of Revision	Originator	Approved By
2.0	12/3/19	New policy and procedure to comply with GDPR	Senior Management Team	Board of Directors

