

# Data Subject Access Request (DSAR) & Deletion Request Policy



Part of **tes**

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Version number: 1

The Company	Vision for Education / ABC Teachers / Smart Teachers
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## Dealing with requests arising from GDPR

Under the General Data Protection Regulations (GDPR) our data subjects (candidates) have the right to:

- Be informed about the personal data the Company processes about them
- Access the personal data the Company processes about them
- Rectification of their personal data
- Erase their personal data in certain circumstances
- Restrict processing of their personal data
- Data portability in certain circumstances
- Object to the processing of their personal data that was based on a public or legitimate interest, and
- Not to be subjected to automated decision-making and profiling.

To comply with GDPR, the data subject must receive a response giving the actions taken within one calendar month. Under certain circumstances, the one calendar month period may be extended. To monitor these timeframes and ensure compliance with the request, the following procedures will be adopted:

- All requests will need to be submitted in writing to [dpo@abc-teachers.co.uk](mailto:dpo@abc-teachers.co.uk) /[dpo@visionforeducation.co.uk](mailto:dpo@visionforeducation.co.uk) /[dpo@smartteachers.co.uk](mailto:dpo@smartteachers.co.uk). The written request can be sent by the candidate or by the person who has received the request verbally or otherwise.
- This will allow the Company to be confident it is capturing all requests and will give a definitive date on which the request was made.
- Those responsible for monitoring the [dpo@](mailto:dpo@) mailboxes will record the name of the data subject, their email address (as a method of identifying them specifically) and the date of request in the DSAR spreadsheet.
- The recording of information at this point is key. Access to the spreadsheet will be limited only to those people who record and manage the process and the Accounts team, who will investigate last day worked to guide the actions available in line with the Data Retention Policy.

## Data subject access requests (DSAR)

- Assess the request to determine if the candidate requires full file or certain documents from the file. Where necessary, the data subject will be asked for additional parameters or clarification if a large request has been submitted.
- The relevant documentation will be collated from digital and paper formats and any central repositories and inboxes.
- All documents within the file will be assessed by the data champion to determine if any documents should be withheld, redacted or exempt.
- All documents will be emailed to the candidate in pdf format and will be password protected. This will only be sent to the email address held on the candidate's file.

## Deletion requests

- Once we have established the last day of work/date of registration/file creation date, we will use the Data Retention Policy to determine which information can be deleted and which information should be retained. Under the Conduct Regulations, we must keep different documentation for differing periods of time. This legal requirement will guide the outcome of the deletion request. Having this documented on the shared spreadsheet will allow us to standardise the responses across the supply businesses. This sharing model will also allow a consensus to be reached on the more ambiguous or complex requests.
- Should the candidate request a full deletion, any staff who has had any involvement with the candidate will be contacted to delete any emails or data in relation to the candidate.
- The deletion request will then be passed to the Salesforce team for actioning on the CRM.
- Once the request has been actioned, the data subject will be contacted and the actions taken will be communicated. The timeline of actions, including the data subject identity, will be held on the One drive. We have a legitimate interest in doing this as should we ever need to restore the system from a back-up, we maintain the data subject's requests and actions taken.