



**Brent Centre
for Young People**

healthy minds, brighter futures.

Subject Access Request (SAR) Policy

Last reviewed: January 2025

Next review: January 2027

1. Purpose

The purpose of this policy is to establish a clear procedure for handling Subject Access Requests (SARs) at the **Brent Centre for Young People**. It ensures compliance with the UK GDPR and the Data Protection Act 2018, allowing individuals to access personal data held about them by our organisation, while maintaining confidentiality and protecting the data of vulnerable clients, particularly adolescents.

2. Scope

This policy applies to all staff, contractors, and volunteers of the Brent Centre for Young People who may be involved in processing SARs. It covers any personal data held on clients, donors, staff, and other stakeholders.

3. Policy Statement

The Brent Centre for Young People is committed to respecting the privacy and data rights of individuals, particularly those receiving mental health support. All SARs will be handled fairly, promptly, and in compliance with the applicable data protection laws.

4. Definitions

- **Personal Data:** Any information that can identify a living individual, directly or indirectly.
- **Data Subject:** The individual to whom the personal data relates.
- **Subject Access Request (SAR):** A request by a data subject to access personal data held about them by our organisation.

5. Rights of Data Subjects

Under the UK GDPR, individuals have the right to:

- Request access to their personal data.
- Know why their data is being processed.
- Understand how long their data will be stored.
- Understand who has access to their data.

6. Making a Subject Access Request

Data subjects (or a legal representative acting on their behalf) can make a SAR in writing, by email, or verbally. To facilitate the process, we provide a **Subject Access Request Form (Appendix A)**, which is available on request from our Data Protection Officer (DPO) or via our website.

In accordance with Brent Centre for Young People's Data Protection Policy subject data is not retained for longer than six years. The Brent Centre for Young People will not be able to respond to information requests pertaining to periods longer than six years. Due to system changes, there may be limited information regarding patient data prior to 2022.

7. Verification of Identity

To protect the privacy of our clients, especially those under 18, we require proof of identity before releasing personal data. Acceptable forms of ID include:

- Passport, driver's license, or national ID card
- Utility bill or bank statement dated within the last three months (for proof of address)

For adolescent clients, requests should ideally be made by a parent or legal guardian, unless the young person is deemed competent to make the request themselves.

8. Timescales for Responding to SARs

We aim to respond to all SARs within one calendar month from the date of receipt of the request and verification of identity. If additional time is required, especially for complex cases, we may extend this period by up to two further months. We will inform the requester of any extension and the reasons for the delay within the initial one-month timeframe.

9. Responding to a SAR

Upon receipt of a valid SAR, the Brent Centre for Young People will:

Step 1: We aim to acknowledge receipt of your request in writing within 3 working days.

Step 2: The identify and authority of the requestor must be verified. The timescale for responding to a SAR does not begin until we have received the requested information.

- (1) If you are requesting your own records: we require a government issued photo ID document such as passport or driving licence. If you are unable to provide this, we will work with you to identify you through an alternative method.
- (2) If you are a third party making the request: it is the third party's responsibility to provide evidence of their authority. They should provide a written communication from the data subject that they have their consent to make the request. The Brent Centre for Young People may need to contact the data subject to confirm the request is legitimate as we do not hold copies of service user signatures.

Step 3: A clinician will review the records and decide what can be released under the Data Protection Act 2018.

Step 4: If you have requested your own records, we will invite you to attend a meeting to view the records with an appropriate representative; this would usually be a member of the clinical team involved with your care. This is an opportunity to speak to a clinician about anything which may be in your records. We will then give you a copy of your records:

- If information is copied to paper from the records, it should preferably be handed to you. If that is not possible, and the information has to be posted, we will send this via 'Royal Mail Special Delivery'.
- If requested electronically the information will be a scanned copy of the manual records and a PDF of any electronic records, sent either via encrypted email or as a password protected PDF with the password sent in a separate email. We will need to confirm the email address prior to sending anything, by sending a test email and telephoning you to confirm receipt.
- If you request, it is possible to provide a verbal response to your SAR, provided that your identity has been confirmed by other means.

10. Exemptions and Restrictions

Certain information may be exempt from disclosure under the UK GDPR and the Data Protection Act, especially when:

- Disclosure could cause serious harm to the physical or mental health of the client or others.
- Disclosure would reveal information about another individual without their consent.
- Disclosure would violate client confidentiality agreements or professional privileges.

In cases where only part of the data is exempt, we will redact the exempt sections and provide as much of the data as possible.

11. Fees

Generally, SARs will be processed free of charge. However, if the request is manifestly unfounded, excessive, or repetitive, The Brent Centre for Young People reserves the right to charge a reasonable administrative fee or refuse to respond. If a fee is charged, we will inform the requester in advance.

12. Data Security

The Brent Centre for Young People is committed to maintaining the security of all personal data. Any data collected for the purpose of fulfilling a SAR will be stored securely and only retained as long as necessary for this purpose.

13. Documentation and Record-Keeping

All SARs, including the request, identity verification, data retrieved, and responses given, will be documented and retained securely in accordance with our Data Retention Policy. These records help ensure accountability and transparency in our data handling processes.

14. Training

All staff, volunteers, and contractors involved in processing SARs will receive adequate training on GDPR requirements and our SAR procedures to ensure consistent and lawful handling of personal data.

15. Contact Information

For questions regarding this policy or to make a Subject Access Request, please contact our Data Protection Officer:

Jameel Ukaye, Data Protection Officer
Brent Centre for Young People
51 Winchester Avenue, London, NW6 7TT
Phone: 020 7328 0918
Email: dataprotection@brentcentre.org.uk

Appendix A: Subject Access Request Form

This form is available to data subjects to help them provide necessary details for processing a SAR.