

## Data Subject Access Request (SARS)

GDPR gives a right to individuals to access the information that is held on them by an organisation. This includes information held on computer, paper, email and even CCTV images if applicable. In response to this TMCP have issued a Managing Trustees SAR Policy. This policy can be accessed through the TMCP website, paper copies are held in the Circuit Office and in the Circuit Data Champions file.

While it the responsibility of TMCP (or Connexions where there is a safeguarding, complaints and discipline matter) to process and progress a person's access request, we need to be aware a request for access can be made to any Church postholder. Not just TMCP, not just the Data Champions. The request can be made in writing, verbally or by email. It does not have to quote the legal basis or legislation that is being made under – it just needs to be a request to see the information that is held on them.

If a Data Subject Access request is made, where possible we should encourage the person to visit the TMCP website in order to download and complete the SAR's form. This can be located on <https://www.t MCP.org.uk/about/data-protection/resources/standard-documents-and-forms/dsar> Once completed, this form contains all the information that TMCP or The Connexional Team need to begin to progress the request. However, not everyone will be in the position to, or want to do this. In these circumstances it will the responsibility of the postholder approached to pass the request on. This must be done as quickly as possible and there are clear timescales that must be abided by.

Please bear in mind that depending on the reasons why someone maybe seeking access to their information this maybe a very emotive time for them, so we need to be as supportive as possible.

If a request is made to a postholder the following actions need to be taken:

1. If the request has been made in writing, then as soon as practically possible it should be forwarded to the Data Protection Manager [dataprotection@tmcp.methodist.org.uk](mailto:dataprotection@tmcp.methodist.org.uk) unless you are aware that the request is a Safeguarding matter and then it should be forwarded to the Data Controller: [safeguarding@methodistchurch.org.uk](mailto:safeguarding@methodistchurch.org.uk)

2. If the request is made via email, forward the email to: *dataprotection@tmcp.methodist.org.uk*. Let the person making the request aware that you have received it and have passed their request on and to whom it has gone to. Record this information in the consent files.
3. If the request is made verbally and the person making the request does not feel able or want to complete the online SARS form, then advise them that you will pass their request on. The form attached may be helpful to gather the information that is needed. Once you have obtained this information, it needs to be sent by email or post to TMCP/Connexion, contact details as above. If you are in doubt about who to forward it to or what action to take then contact the Circuit Data champion as quickly as possible.
4. We should advise the person making the access request that unless there are well known to the local church, they may need to provide proof of identity due the confidential nature of the information being requested.

Responsibility for progressing a Data Subject Request beyond this point rests with TMCP or the Connexional Team. They will contact the individual directly and liaise the District Data Champion and Circuit Data Champion in respect of information gathering.

NB It is important to note that there are some church documents such as consent forms and Volunteer Agreements that the individual who has completed them has a right to have a copy of. If someone has just lost their copy and wants it replacing or wants to check what they have consented to, this can be dealt and where appropriate copies given without the formality of a SARS request. If you are unsure what is being asked for, please try to clarify or take advice from the Data Champion.

*This document was due to be accepted at Circuit Meeting in March 2020, and awareness sessions to be given across the Circuit – however it was stopped by current pandemic. (August 2020)*