# DSAR (Data Subject Access Request) Best practice guide for Parishes Steps to consider:

* Contact the ICO and explain the DSAR and request as much advice as possible.
* Speak to the Diocesan DPO.
* You must respond to initial DSAR within 72 hours.
* Deadline to complete DSAR is 28 days from receipt of request.
* Reach out to all PCC and role holders to ask if they have any data related to the Data Subject
* Create a new email address to forward any duplicates. (DO NOT use own personal email address).

## Special circumstances (if minor is involved)

* Seek legal advice via the Diocesan DPO or Diocesan Registrars (will be free initially).
* Understanding the Safeguarding element of the case is crucial.
* Main objective is to remove all data that exists related to the minor.

## Advice/best practice going forward includes the following:

* Meeting minutes are best way to record any notes from a meeting.
* Think about how you discuss data with your PCC.
* Be conscious of what you are recording, sharing and why?
* Be clear on what you what to record in a meeting.
* Understand that opinions and thoughts of individuals when in writing is their personal data and does NOT need to be included.
* As a rule - Do NOT forward emails with sensitive information.
* Please be aware notes you may have taken will be related to a DSAR and are in scope.
* Online meetings and in-person meetings are best approach to being GDPR compliant.

Tips on redacting:

* Three options on how to do a data redaction:
	+ print out everything and use sticky labels to block out sensitive data and then photocopy.
	+ Or print out and use black highlighter marker pen to block out sensitive data
	+ Or use Adobe Redaction software to block out any sensitive data in black
* For data to be relevant it must be related to the subject.

## Delivery of DSAR to Subject:

* Ask how the Subject wants to receive the data? Encrypted email, hand delivered USB stick or by special delivery post?
* Include a covering letter stating you have received legal advice and outline approach taken
* Include the proof of date delivered and take a photo of you delivering the DSAR to the address

Further Requests:

* If a Subject comes back a second time and wants more data, only send the new data you may find.
* If a third request is made, this may be deemed vexatious. No action is required.