Data Subject Correction Request Procedure
for Pennine District

Issue 1 Draft 1 : March 2018

About this procedure

This procedure defines how Pennine District will manage data subject requests to correct (rectify) erroneous or incomplete data in accordance with the UK Data Protection Bill 2017. It should be read in conjunction with current information and guidance published by the UK Information Commissioner's Office (ICO – http://ico.org.uk/)
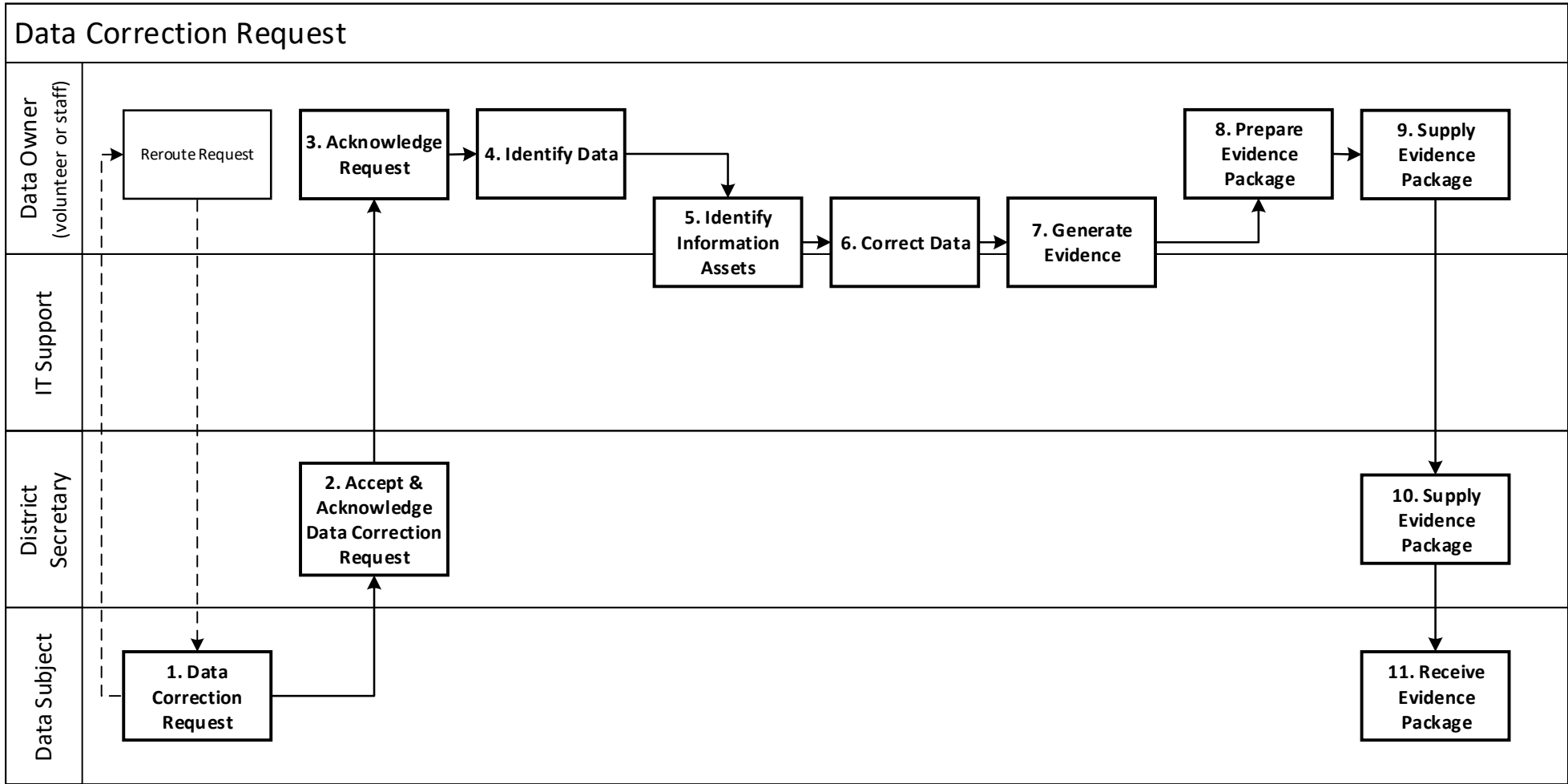
Note that once the UK leaves the European Union, additional requirements of the European Union General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) may continue to apply with respect to data processed relating to EU citizens, which may include youth members and volunteers. As Pennine District does not regularly process data relating to citizens of the EU as a matter of course, it is considered that the UK Data Protection Bill 2017 will meet the requirements of the EU GDPR regulation. Should this position change this procedure will be reviewed.

The general requirements for data protection are defined in the Pennine District Data Protection Policy.

Where possible, corrections to personal data should be made by Pennine District staff or volunteer administrators using standard data management processes and without recourse to this procedure.

The Pennine District may choose not to correct subject data where the Pennine District considers that the data held is correct, where changing the data breaches other overriding regulatory requirements (including the rights or freedoms or other natural persons) or where the request is considered malicious (minor corrections which are considered, basis on prior evidence, as intended solely to inconvenience Pennine District). Where such requests are refused, the Pennine District Secretary must advise the data subject of the reason why the request will not be complied with and the data subjects right to complaint to the ICO and to seek judicial remedy.

The general process for implementing data subject correction requests is shown overleaf. Note that depending upon the scope of the request, this process may be combined with a data deletion request.

Data Correction Request

Data Owner (volunteer or staff)	Reroute Request	**3. Acknowledge Request** → **4. Identify Data** → **5. Identify Information Assets** → **6. Correct Data** → **7. Generate Evidence** → **8. Prepare Evidence Package** → **9. Supply Evidence Package**
IT Support		
District Secretary	**2. Accept & Acknowledge Data Correction Request**	**10. Supply Evidence Package**
Data Subject	**1. Data Correction Request**	**11. Receive Evidence Package**

This process is described in more detail below

Step	Description
1. **Data Correction Request**	The Data Subject makes a data subject correction request. This should be directed to the Pennine District Secretary (any member of staff of any other volunteer, including the data owner (Responsible Officer) should direct the request to the Pennine District Secretary.
2. **Accept and Acknowledge Data Correction request**	The Pennine District Secretary should immediately acknowledge receipt of the data subject correction request.
	The Pennine District Secretary should maintain a log of all requests including:
	• Date request received
	• Data subject name and contact details
	• Scope of data subject correction request
	• Date of request acknowledgement
	• Date data correction confirmed
	The Pennine District Secretary may, in consultation with the Data Protection Officer, refuse a data correction request as outlined above.
	Where the scope of the request is not specific, the Pennine District Secretary should seek to clarify the scope of the request i.e. exactly what data is incorrect and what the correct data should be.
	The Pennine District Secretary should inform the Data Protection Officer that a data subject correction request has been received and the Data Protection Officer should provide support and guidance as needed.
	The Pennine District Secretary should determine, with support from the Data Protection Officer, whether the data subject correction request is complex or simple.
	If the request is considered complex (see Annex 1), the Pennine District Secretary should inform the data subject that the request is complex and that the requested data will be corrected within 90 days.
	If the request is not considered complex (see Annex 1), the Pennine District Secretary should inform the data subject that the data will be corrected within 1 month.
	The Pennine District Secretary should inform the data owner(s) (Responsible officers) of the data subject access request.
3. **Acknowledge Request**	The data owner(s) (Responsible Officers) should acknowledge the data correction request to the Pennine District Secretary and prioritise their activities accordingly
4. **Identify Data**	Based upon the defined scope of the data subject correction request, the data owner(s) (Responsible Officers) should identify the specific datasets that need to be corrected.
5. **Identify Information Assets**	Based upon the defined scope of the data subject correction request, and the datasets identified by the data owner(s) (Responsible Officers), the data owner(s) and Pennine District IT Support will identify the appropriate IT Assets e.g.
	• Hard copy folders or file store
	• Office 365 datastore (e.g. email account, OneDrive folders SharePoint site and webpart [list, folder, database])
	• Other system or database (e.g. OSM, Compass)
	Note that at this stage it may be discovered that erroneous data may have been shared with third parties. Where this is the case the third party should be requested to also correct the data and provide evidence of compliance.
6. **Correct Data**	Using appropriate search criteria (filters, date ranges, keywords etc) derived from the scope of the data subject correction request, the data owner(s) (Responsible Officers) and Pennine District IT Support will correct data and records within the scope of the request (as hard copies and/or a separate electronic copy).

Step	Description
	If there are any queries with respect to the changes to be made, these should be clarified with the data owner(s) (Responsible Officers), Pennine District Secretary or data subject as appropriate.
7. **Generate Evidence**	The data owner(s) (Responsible Officers), assisted by the Pennine District IT Support will generate and retain evidence of the data correction being made. This will typically include: • A copy of the corrected hard copy • Before and after screen shots of the corrected data Care should be taken to redact any evidence in accordance with step 7 of the data subject access request procedure to ensure that the evidence contains no personal, sensitive or confidential data.
8. **Prepare Evidence Package**	The data owner(s) (Responsible Officers) should prepare the necessary evidence package. This should be in a human accessible format (hard copy or electronic copy which is readable through readily available software e.g. PDF readers). Data should be organised in a logical order (e.g. dataset type, date order etc) although it is not necessary to provide a complete index or search facility.
9. **Supply Evidence Package**	The data owner(s) (Responsible Officers) should supply the evidence package to the Pennine District Secretary in a suitable format (usually a hard copy folder with all contents secured, or a secure electronic store to which suitable access can be granted e.g. through the use of a temporary, read only Pennine District account and User ID).
10. **Supply Evidence Package**	The Pennine District Secretary should supply the evidence package to the data subject in a suitable format as defined above, and request acknowledgement of receipt from the data subject. A record of transmittal should be retained and the data subject correction request log updated.
11. **Receive Evidence Package**	The data subject receives the evidence package (or access to the evidence package) and should acknowledge receipt. Any subsequent correction request may be reconsidered as malicious described above.

Annex 1 – Complex Data Subject Correction Requests

Pennine District considers the following data subject correction requests to be complex. Where this is the case, acknowledgement of the request should be provided to the data subject within 30 days of receiving the request and the evidence should be provided to the data subject as soon as possible, and always within 90 days of receiving the request.

- Any request involving a combination of electronic and hard copy data
- Any request involving multiple data stores from within the Pennine District Office 365 environment (e.g. email accounts, OneDrive folders, SharePoint sites [lists, folders, databases])
- Any request involving a Pennine District Office 365 data store and any other system (e.g. OSM, Compass membership database etc)
- Any request involving data held by Pennine District volunteers in personal (secure) storage locations

All other such requests are considered simple and the data should be corrected and evidence provided to the data subject within 30 days of receiving the request.

If in doubt, the Data Protection Officer, balancing the rights of the data subject and the ability of the District to correct the data, will provide a definitive determination of whether a data subject correction request is considered simple or complex.