Catch22 Group Policy

Data Subject Rights Policy

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Catch22 reserves the right to amend this policy, following consultation, where appropriate.

Policy Owner:	Michael Oniyitan
Queries to:	Michael Oniyitan
Date created:	31/05/2018
Date of last review:	13/04/2026
Date of next review:	13/04/2027
Catch22 group, entity, hub:	Catch22 Charity
4Policies level (all staff or managers only)	All Staff

1. Purpose

Catch22 understands and respects that data subjects have rights relating to their data as set out in UK Data Protection Legislation. It is important for all stakeholders to understand what these are and their responsibilities regarding these rights. This policy aims to ensure timely, lawful, and consistent responses to data subject right requests protecting individuals' ability to exercise their rights.

2. Scope

This policy applies to all company employees, volunteers, secondees, contractors, agency workers, and external users. The policy applies to data processing regardless of systems, data formats, and processing activities.

3. What are Data Subject Rights?

The UK General Data Protection Regulation (UK GDPR) gives data subjects several rights regarding their personal data. This is to ensure that their personal data is handled with care and transparency, and are designed to protect individuals' control over their information.

These rights do not always apply and are dependent on the purpose of processing and legal basis for doing so. It is therefore important that all Subject Rights requests Catch22 receive are immediately forwarded through to DPO@catch-22.org.uk.

The Data Subject Rights under UK GDPR are:

1. **The right to be informed (Articles 13 and 14)** – Individuals have the right to be informed about the collection and use of their data.

2. **The right of access (Article 15)** – Individuals have the right to access and receive a copy of their personal data, and other supplementary information (also known as a Subject Access Request).

3. **The right to rectification (Article 16)** – Individuals have the right to have inaccurate personal data rectified, or completed if it is incomplete.

4. **The right to erasure (Article 17)** – Individuals have the right for their personal data to be erased.

5. **The right to restrict processing (Article 18)** – Individuals have the right to request the restriction or suppression of their personal data.

6. **The right to data portability (Article 20)** – Individuals have the right to obtain and reuse their personal data for their own purposes across different services.

7. **The right to object (Article 21)** – Individuals have the right to object to the processing of their personal data in certain circumstances.

8. **Rights related to automated decision making including profiling (Article 22)** – Individuals have the right to not be subject to a decision based solely on automated processing which produces legal effects concerning them.

The UK GDPR outlines that Catch22 have an obligation to respond to requests without undue delay, and communication is to be concise and in plain language. Catch22 also have the right to refuse requests that are manifestly unfounded or excessive providing we can evidence that is the case; requests must ***never*** be refused without confirmation from the Data Protection Officer first.

4. Managing Subject Rights Request

Individuals can submit a rights request (for example Subject Access Request, Erasure Request, and Rectification request) in any format. It can be submitted verbally or written. It can be submitted via post, social media, and email. Providing the intention is clear, it is a valid request and Catch22 must respond within one calendar month.

If any request regarding an individual's personal data is received, it must be sent to DPO@catch-22.org.uk for guidance on fulfilling the request in compliance with UK Data Protection Legislation.

5. Catch22 Responsibilities

The UK GDPR outlines roles for organisations involved in processing personal data. These include:

- **Data Controller** – those that alone or jointly with others, determine the purpose and means of processing personal data.
- **Data Processor** – Those that process personal data on behalf of the controller under their instructions.

Responsibilities are typically agreed in Service Contracts, Data Processing Agreements, or Information Sharing Agreements.

Where Catch22 are a Data Controller, we are responsible for the management and completion of data subject rights requests that have been received.

Where Catch22 are a Data Processor, we can only act on instruction from the Data Controller. In these cases, we must send the request through to the Data Controller as soon as we have received it, we must not respond directly, and we must assist the Data Controller with fulfilling the request. Timeframes for doing so are typically documented in the Data Processing Agreement.

If there is uncertainty as to whether Catch22 is a Data Controller or Data Processor for specific information, guidance can be provided by DPO@catch-22.org.uk.

6. Subject Access Requests (SARs)

The most common data subject rights request received are Subject Access Requests. These can be driven by several motivating factors. When receiving a SAR, it ***MUST*** be immediately sent to DPO@catch-22.org.uk. The Data Protection Team will then verify the requestor, verify the scope of the request, and request the information from the relevant services. The information is then searched, compiled into one file, and then redacted which involves the removal of information that cannot be disclosed legally under UK GDPR.

Information is typically sent directly to the requestor by the Data Protection Team along with supplementary information. In special circumstances, it may be provided through the service instead, this is dependent on the specific case.

All SARs are documented on the Subject Access Request Log with supplementary information including the deadline date for responding.

Where Catch22 are a Data Processor, these requests are to be sent to the Data Controller's contact (typically documented in a Data Processing Agreement) as soon as received to enable a response from the Controller within the legal timeframe.

It is important to note that a Subject Access Request applies to data processed at the time it is received, it is therefore important to ensure that data regarding a data subject is not deleted after a Subject Access Request has been received.

By default, Catch22 do not charge fees to data subject's that submit Subject Access Requests. There may be circumstances where a fee may need to be charged but these would require senior stakeholder authorisation and documentation of the approval. Where a charge is to be applied, it must only be considered where the request is either;

1. Manifestly unfounded, excessive, or repetitive
2. Where the request is for further copies of information already provided

Data can be provided in both electronic and written format which is dependent on the requester's preference and the viability of producing the data in that format. The requester's data will be provided to them without undue delay and within one calendar month of the request being received. Where verification of the requester or clarification questions about the request are required, time is paused until responses from the requester have been received.

It is possible that the time period may need to be extended by an additional two months taking into account the complexity and number of requests received. In instances where

we need to extend the deadline, our Data Protection Team must inform the requester of the extension and reason for extension.

7. Right to Withdraw Consent

One legal basis for processing information is under the consent of the data subject. When using consent, the data subject has a concrete right to withdraw consent. When withdrawing consent, Catch22 must cease the processing of all information covered by the original consent. If a request to withdraw consent is received, Catch22 must honour the request without penalty when acting as the Data Controller. Where Catch22 is a Data Processor, the request must be forwarded to the Data Controller immediately.

Individuals can withdraw consent at any time and it must be as easy for the individual to withdraw consent as it was to give it. Catch22 will not penalize an individual for withdrawing consent and must be transparent in the impact withdrawing consent will have.

These requests can be complex as withdrawal of consent does not apply where another lawful basis is relied upon, it is therefore an absolute first step that all requests are sent to DPO@catch-22.org.uk for assistance to be provided.

8. Right to Complain

Complaints can be driven by several factors including some rights not being applicable to the specific processing completed by Catch22, and Data Subjects disagreeing with the output of their request.

If a complaint is received, it must be forwarded to DPO@catch-22.org.uk immediately.

The Data Protection Team will verify the complainant, verify the complaint, conduct fact finding exercises, and identify any areas of non-compliance or failure. Where there are points of failure, corrective actions will be identified and taken with ongoing communication to the data subject. The process is documented and reviewed at least annually.

As enforced through the Data (Use and Access) Act 2025, Catch22 must have an easily accessible complaints process and meet certain deadlines. As a minimum, Catch22 have:

1. Data Protection Complaints Process - Internal
2. Data Protection Complaints Process – Public
3. Complaints Log

Catch22 must acknowledge complaints within 30 days of receipt and investigate without undue delay. The Data Protection team aim to acknowledge complaints within 1 week of receipt allowing investigation to take place. If a complaint is outlining a data breach, a 30

day time for acknowledgement increases time to breach containment allowing an increased impact on all stakeholders involved.

All complainants will be provided steps for escalation of the complaint to the Information Commissioner's Office.

9. Policy Compliance

Compliance Measurement

The Information Security Management Review Team will verify compliance to this policy through various methods, including but not limited to, business tool reports, internal and external audits, and feedback to the policy owner.

Exceptions

Any exception to the policy must be approved and recorded by the Information Security Manager in advance and reported to the Management Review Team.

Non-Compliance

An employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

Continual Improvement

The policy is updated and reviewed as part of the continual improvement and process.

10. Related policies

- Data Protection Policy Suite
- Information Security Policy Suite

11. Document Version Control

	Last Modified	Last Modified By	Changes Made
1.0	30/06/2022	Beverley Clark	Policy made live to meet UK Data Protection Legislation
2.0	13/04/2026	Ben Wright	Policy rebuilt for accessibility and accuracy
2.1	19/06/2026	Ben Wright	Updated to include the complaints process

12. Annex 1: Equality Impact Assessment

Summary

This EIA is for:	DP 06 Subject Rights Policy
EIA completed by:	Michael Oniyitan – Data Protection Officer
Date of assessment:	24/02/2026
Assessment approved by:	Assistant Director - Justice

Catch22 is committed to always: avoiding the potential for unlawful discrimination, harassment and victimisation; advancing equality of opportunity between people who share a protected characteristic and those who do not; and, foster good relations between people who share a protected characteristic and those who do not.

An Equality Impact Assessment (EIA) is a tool for identifying whether or not strategies, projects, services, guidance, practices or policies have an adverse or positive impact on a particular group of people or equality group. Whilst currently only public bodies are legally required to complete EIA's under the Equality Act 2010, Catch22 has adopted the process in line with its commitment to continually improve our equality performance.

Policy owners are required to complete or review the assessment indicating whether the policy has a positive, neutral or negative impact for people who it applies to and who share one or more of the 9 protected characteristics under the Equality Act 2010. Definitions are based on the Equality & Human Rights (EHRC) guidance.

Objectives and intended outcomes
This EIA has been completed in order to ensure that the implications and potential impact, positive and negative, of this policy have been fully considered and addressed, whether or not people share a protected characteristic.

Potential Impacts, positive and negative

Equality Area	Positive	Neutral	Negative	Please give details including any mitigation for negative impacts
Age Does this policy impact on any particular age groups or people of a certain age?	☒	☐	☐	
Disability Does this policy impact on people who have a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day to day activities?	☒	☐	☐	
Gender reassignment (transsexual, transgender, trans) Does this policy impact on people who are transitioning from one gender to another (at any stage)	☐	☒	☐	
Marriage and civil partnership Does this policy impact on people who are legally married or in a civil partnership?	☐	☒	☐	
Pregnancy and maternity (in work this is linked to maternity leave, non-work this is for 26 weeks after giving birth)	☐	☒	☐	

Does this policy impact on people who are pregnant or in their maternity period following the birth of their child?				
Race Does this policy impact on people as defined by their race, colour and nationality (including citizenship) ethnic or national origins	☒	☐	☐	
Religion and belief Does this policy impact on people who practice a particular religion or none, or who hold particular religious or philosophical belief or none?	☐	☒	☐	
Sex Does this policy impact on people because they are male or female?	☐	☒	☐	
Sexual orientation Does this policy impact on people who are sexually attracted towards their own sex, the opposite sex or to both sexes?	☐	☒	☐	

More information/notes

Please add any links to key documents or websites to evidence or give further detail on any impacts identified.
• The policy applies equally to all individuals whose personal data is processed by Catch22, including service users, staff, and other stakeholders.

- Requests may be made through multiple channels, reducing barriers for individuals who may otherwise be disadvantaged.
- Where identity verification or clarification is required, this will be carried out proportionately and with sensitivity to individual circumstances.
- No negative equality impacts have been identified. The policy is considered to have an overall positive impact by enabling individuals to exercise their statutory rights fairly and consistently.