

NEU Pension Scheme (“the Scheme”) Subject Access Request (SAR) Process

Purposes and Trustee Responsibilities

Under UK GDPR, members have the right to:

- See their personal data
- Know how it is being used
- Request corrections or deletions
- Ask who their data has been shared with

Members don't need to use the words "Subject Access Request" or mention UK GDPR. Any request for their personal information counts as a SAR.

Right to Complain

Members have the right to contact the Trustees or Trustee data protection officer (if appointed) if they have any concerns with how their personal data is used. Trustees will acknowledge within 30 days, investigate and do their best to resolve member concerns. Members also have a right to complain to the Information Commissioner's Office (ICO) if they believe that Trustees use of their personal data is in breach of data protection laws and/or regulations. More information can be found on the ICO's [website](#). Exercising this right will not affect any other legal rights or remedies members have.

Trustee Responsibilities as Data Controllers, the Trustees are legally responsible for:

- Ensuring SARs are responded to within one month
- Providing accurate and complete information
- Making key decisions (when to refuse, what exemptions apply)
- Ensuring their service providers handle SARs correctly

The Trustees remain responsible even when the operational work is delegated.

Who Manages SARs?

The Trustees have appointed **First Actuarial LLP** to manage SARs on their behalf.

The Trustees have delegated SAR management to: First Actuarial

What this means:

- The Administrator handles the operational work (receiving requests, gathering data, drafting responses)
- The Trustees remain responsible for decisions and compliance
- The Administrator must escalate key decisions to the Trustees

SAR Management Process

Responsibilities:

- SAR Manager: First Actuarial handles day to day matters
- The Trustees decide refusals, exemptions, extensions

The Process:

When	Action	Who
Day 0- 3	Log and acknowledge the request, verify identity	SAR Manager
Day 4 -7	Contact individual to clarify what data, time period, and format required if request is ambiguous or overly broad	SAR Manager
Day 8 - 14	Escalate if you need to refuse, apply exemptions or extend	Trustees
Week 1 - 3	Contact all data holders for information	SAR Manager
Week 3 - 4	Redact third-party data, compile response	SAR Manager
Day 30	Send response	SAR Manager

When Trustees Must Decide

The SAR Manager will escalate immediately for:

- **Refusals:** where manifestly unfounded/excessive
- **Exemptions:** due to legal privilege, negotiations, safeguarding concerns, or ongoing investigations
- **Extensions:** complex requests can be extended by an additional **two months** (the member will be notified of the extension within first month of the request)

The Trustees should respond within three working days.

The following information will be included in the response:

- The data requested
- Explanation of searches done
- Any exemptions applied and why
- Information regarding the right to complain to the ICO

The following records will be retained (for a period of 6 years):

- Data received/ acknowledged
- Identity verification
- Searches conducted
- Decisions made
- Date sent