

Find a job Subject Access Request/ Right of Access Request process

Background

Under the provisions of the Data Protection Act (DPA) jobseekers using Find a job have the right of access to their own personal information. Upon **written request**, {a Subject Access Request (SAR/RAR) or Right of Access request (RAR)}, they are entitled to have a copy of their own personal information held by DWP, or held by someone providing the Find a job service to DWP (Adzuna). It is a legal requirement under the Act to provide the personal information within 40 calendar days from the date of receipt of the SAR/RAR anywhere within DWP or its service provider. As part of GDPR (from 25th May 2018) this period will change to one month.

We must comply with a Find a job SAR/RAR even though the jobseeker can view and take a print off of their personal information.

Note - a SAR/RAR need not quote the DPA nor need it say that it is a SAR/RAR, it might just say "I want a copy of all the information you on hold about me on Find a job". It may say "I want you to send me all my personal information", so we will have to clarify exactly what personal information the jobseeker is wanting a copy of.

The key requirements for the DWP are to:

1. Provide a mechanism to allow SAR/RARs to be raised (by job seekers)
2. Verify the identity of the user raising the request
3. Extract the data held in the Find a job system for that user (e.g. activity history, logins etc)
4. Provide the data in a readable, understandable format in a secure way to the user (e.g. post)

UJ SAR/RARs made in writing

There are two points of contact where a written UJ SAR/RAR may be received from a jobseeker:

- to the DWP Service Desk via the Find a job 'Contact Us' facility
- to a DWP DPO (either directly from the jobseeker or via DWP business or the website [DWP Personal Information Charter](#))

The Find a job SAR/RAR process is designed around the fact that the jobseeker will make his SAR/RAR by logging into his UJ account using his own email address and password. It is also designed around the fact that the requested information will be sent to the jobseeker by the DWP DPO and not by the DWP Service Helpdesk or by the service provider, Adzuna.

SAR/RAR made through the "Contact Us" facility

This is the process for handling a SAR/RAR made through the "Contact Us" facility.

Upon a SAR/RAR made through the "Contact Us" facility:

1. The SAR/RAR will come directly to the DWP Service Desk via the UJ “Contact Us” facility. These requests will confirm that the user is signed into their account. The DWP Service Desk will contact the jobseeker via email and acknowledge receipt of the SAR/RAR. The DWP Service Desk will ask for confirmation of the jobseeker’s identity (ask them to send a confirmation email from their verified email account), and address/postcode to which they want their information to be sent. This measure will help to identify any fraudulent use of the jobseeker’s account by a third party at the time of the first request made via UJ. The DWP Service Desk will use standard wording, which is currently:

“Thank you for your request for your Find a job information. So we may securely identify you, please reply back to this email to validate that you are in control of the email account associated with your Find a job account.

Please confirm your full name and postal address for receiving the information we hold on your account.”

2. Once the jobseeker has confirmed his details and provided all relevant information, the DWP Service Desk will send the SAR/RAR to the relevant DWP DPO, by secure GSI email. The DWP Service Desk will have access to the DWP Data Protection Officer List to identify the relevant DWP DPO. The DWP Service Desk will provide the date of receipt of the request to the DWP DPO so that the 40 calendar day/ one month date can be calculated.
3. The DWP DPO will send letter “SANTA02 – Acknowledgement Letter” to the user and set a B/F date for 20 day 10 calendar days to monitor the Find a job SAR/RAR’s progress with the DWP Service Helpdesk.
4. As well as the action at (2) above, the DWP Service Desk will securely send the SAR/RAR to the Adzuna Helpdesk for Adzuna to gather in the Find a job information. **Only the Find a job information components of the SAR/RAR will be sent to the Adzuna Helpdesk. The non-Find a job information components of the SAR/RAR will be withheld from the Adzuna Helpdesk to prevent the disclosure of this information.** The DWP Service Desk will provide Adzuna with the 40 day/one month calendar day date. The Adzuna Helpdesk will acknowledge and confirm receipt of the Find a job SAR/RAR with the DWP Service Desk via secure methods. The Adzuna Helpdesk will promptly gather in the requested Find a job information and send it by secure methods to the DWP Service Desk. The DWP Service Desk will set a B/F date for 15 calendar days to monitor the SAR/RAR to ensure that Adzuna returns the information to it promptly and, in any case, within a reasonable timescale to ensure that the 40 day/one month calendar day time limit is met. The Adzuna Helpdesk will **immediately** tell the DWP Service Desk if there are any delays in the process which mean that the 40 day/one month calendar day date may or will be missed. The DWP Service Desk will immediately tell the DWP DPO of the delays so that so that appropriate action can be taken.

5. At the **20 day** 10 calendar day B/F date set by the DWP DPO, if the FIND A JOB personal information has not been returned by the DWP Service Desk, the DWP DPO will contact the DWP Service Desk via email and ensure that the DWP Service Desk has made arrangements to request the FIND A JOB information and that receipt is on target. If not, the DWP Service Desk will provide the reasons for delay to the DWP DPO, so that appropriate action can be taken.
6. When the DWP Service Desk receives the requested information from the Adzuna Helpdesk, it will send the information, by secure GSI email, to the DWP DPO, identified at (2) above, with explanations as to any terminology and abbreviations that may appear on the record. Explaining terminology and abbreviations may require input from the Adzuna Helpdesk, the DWP Service Desk, or even the DWP DPO if the information has been placed on FIND A JOB by DWP staff.
7. The DWP DPO will redact any exempt information and third party information and make arrangements to send the FIND A JOB personal information to the customer together with explanations of any terminology and abbreviations and letter "SANTA05 – SAR/RAR closure letter".
8. If the request has come via the "Contact Us" facility and is for **non- Find a job information**, the DWP Service Desk will send the SAR/RAR to the relevant DWP DPO, by secure GSI email. The DWP Service Desk will have access to the DWP Data Protection Officer List to identify the relevant DPO. The DWP DPO will make arrangements to provide the requested **non-Find a job information** to the user. For non-Find a job information, the DWP DPO will follow guidance in the DWP Subject Access Request Guide (SAR/RARG) for handling requests for personal information which is not held on the Find a job System.
9. If the jobseeker has raised an anonymous request via the UJ "Contact Us" facility the DWP service desk will follow the actions in (1) above asking the jobseeker to login via their account and use the "Contact Us" facility giving their request details.

UJ SAR/RAR made by a solicitor/third party via the "Contact Us" facility

10. It is envisaged that a request for Find a job information made by a solicitor/third party will be made in writing and received by a DWP DPO (either directly from the solicitor/third party or via DWP business) rather than via the "Contact Us" facility. If a request is received from a solicitor/third party via the "Contact Us" facility, the DWP Service Desk will send the SAR/RAR to the relevant DWP DPO, by secure GSI email. The DWP Service Desk will have access to the DWP Data Protection Officer List to identify the relevant DWP DPO. The relevant DWP DPO may need to be identified, firstly, from the postcode of the jobseeker or, if this is not possible, from the postcode of the solicitor/third party. The DWP DPO will send acknowledge letter "SANTA02S – Acknowledgement letter to customer and solicitor/third party when SANTA01S or SANTA03 have been received or are not appropriate" to the solicitor/third party using the appropriate optional paragraphs.

UJ SAR/RAR made in writing and received by a DWP DPO (either directly from the jobseeker or via DWP business) not via the FIND A JOB“Contact Us” facility

This is the process for handling a SAR/RAR received by a DWP DPO in writing not via the Find a job‘ Contact Us’ facility:

11. For Find a job information, the DWP DPO will write to the jobseeker and advise him to make his SAR/RAR via the Find a job “Contact Us” facility. The DWP DPO will use the optional paragraph on letter “SANTA02 – Acknowledgement Letter” which reads :

“Thank you for your request for your Find a job information. So we may securely identify you, please reply back to this email to validate that you are in control of the email account associated with your Find a job Jobmatch account.

Please confirm your full name and postal address for receiving the information we hold on your account.”

12. Once the user makes his Find a job SAR/RAR via the FIND A JOB“Contact Us” facility, the SAR/RAR will be handled following the guidance from (1) above.
13. For non- Find a job information, the DWP DPO will follow guidance in the DWP Subject Access Request Guide or Request for A(SAR/RARG) for handling requests for personal information which is not held on Find a job.

Find a job SAR/RAR made in writing by a solicitor/third party and received by a DWP DPO (either directly from the solicitor/third party or via DWP business) not via the Find a job “Contact Us” facility

14. It is envisaged that a request for Find a job information made by a solicitor/third party will be made in writing and received by a DWP DPO (either directly from the solicitor/third party or via DWP business) rather than via the Find a job Contact Us“ facility. The DWP DPO will send acknowledge letter “SANTA02S – Acknowledgement letter to customer and solicitor/third party when SANTA01S or SANTA03 have been received or are not appropriate” to the solicitor/third party using the appropriate optional paragraphs.