LASER Subject Access Request Policy and Procedures

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Policy Statement

You have a right, under the UK General Data Protection Regulation, to access the personal data we hold on you. To do so, you need to make a written request, called a Subject Access Request, and this policy sets out how you should make such a request, and the actions that Laser Learning Awards (LASER)[1] will take upon receiving the request.

Policy Relevance

LASER will consider Subject Access Requests from any individual who believes that LASER holds any of their personal data.

If a Subject Access Request is made on behalf of someone else, LASER needs to be satisfied that the third party making the request is entitled to act on behalf of the individual to whom the data relates. This may be by seeking their direct permission. An under 18 year old may make a Subject Access Request themselves if they are able to understand their rights in this, or it may be made by a parent/guardian if the child authorises it or if it is evident it is in the best interests of the child.

"Personal data" is defined by the Information Commissioner's Office (ICO) as any information relating to an identified or identifiable individual. A person must be able to be directly or indirectly (ie in combination with other information) identified by that information, and the information must relate to the individual.

"Special categories of personal data" is defined by the UK GDPR as:

- personal data revealing **racial or ethnic origin**;
- personal data revealing **political opinions**;
- personal data revealing **religious or philosophical beliefs**;
- personal data revealing **trade union membership**;
- **genetic** data;
- **biometric** data (where used for identification purposes);
- data concerning **health**;
- data concerning a person's **sex life**; and
- data concerning a person's **sexual orientation**.

Policy Responsibility and Review

This policy is the responsibility of the Deputy CEO and will be reviewed by July 2027 at the latest.

Subject Access Request Procedure

Subject Access Requests should be made in writing by email to datamanager@laser-awards.org.uk. You should put Subject Access Request as the subject of your email. Please be clear and specific about the personal information you are seeking and any date parameters.

Requests should be accompanied by evidence of your identity. If this is not provided, we will contact you to ask that such evidence be forwarded before we can comply with the request.

LASER will acknowledge your request within five working days[2] of receipt and will then provide you with the information requested as soon as reasonably possible, which will usually be within one calendar month of receiving satisfactory proof of your identity. Where requests are complex or numerous, LASER may contact you to inform you that an extension of time is required. The maximum extension period is two calendar months beyond the initial one-month deadline.

LASER will provide you with the information requested in as efficient and effective manner as is reasonable. Where the information contains references to other people's personal information, this will be redacted in order to protect their personal information and any information relating to them which may be confidential, commercially sensitive, etc.

LASER may refuse to deal with a Subject Access Request in line with ICO guidance, for example because of the types of

[1] *All references to LASER in this document also refer equally to Trident Awards, which is the brand name for LASER's work in the security industry.*

[2] *Throughout this document, number of working days does not include weekends, English public holidays, or LASER's Christmas office closure dates.*

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information requested, such as information which is subject to legal privilege; if it is manifestly unfounded or excessive; if it is repetitive or not enough time has passed since your last request (e.g. your information has not changed since then); if it is vexatious or intentionally designed to harass, disrupt, or cause expense to LASER, or if it is threatening or uses offensive language. Where this is the case, LASER will contact you without undue delay, and at the latest within one month of receipt of your proof of identity, to inform you of this and to provide an explanation, and you will be informed of your right to complain to the ICO.

If you are not satisfied with the response you receive, you should first notify LASER in writing which can be by email reply to the response you have received. If you think personal information is missing from the response, you should clearly identify what other information you think LASER also holds. If you remain dissatisfied with final response you may make a complaint to the ICO.

LASER will normally comply with your request at no cost. However, if the request is complex or excessively repetitive, LASER is entitled to request a fee. This fee will be determined at the relevant time and will be set at a level which is reasonable in the circumstances of the request made. In addition, LASER may also charge a reasonable fee if you request further copies of the same information already provided.

Vexatious Correspondence or Behaviour

LASER staff have the right to work without fear of abuse, intimidation, or harassment. Threatening or abusive correspondence or behaviour will not be tolerated under any circumstances, and LASER staff will not engage with persistent or harassing contact from complainants. If this kind of behaviour occurs, LASER will treat it as vexatious.

Vexatious behaviour includes, but is not limited to:

- Abusive, intimidating or threatening written or telephone correspondence or physical behaviour in a face-to-face meeting.
- Abusive, intimidating, threatening or false posts on social media, forums, or other online platforms.
- Persistent, repeated contact without providing any new information or evidence, or harassment of any kind.
- Making unreasonable demands on LASER staff, eg outside the remit of the complaint.
- Making accusatory or malicious remarks about or against LASER, LASER staff or representatives, or LASER centres.
- Making complaints known to be false/inaccurate/misleading.

Vexatious behaviour will be reported to the Deputy CEO or CEO to be dealt with appropriately, which may include reporting to the police where an offence has been committed. All vexatious behaviour will be reported to the LASER Quality Committee and to the LASER Board, either of which may request specific action be taken against the perpetrator as a result.

Policy Approval

Approved internally by Deputy CEO: 30.09.2026
Approved externally by Quality Committee: 14.10.2026

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