



# Data Subject Rights Request: Policy and Procedure

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**Please note:**

In advance of taking any steps to process a Data Subject Rights Request (DSRR), please ensure you read this Document in full and that you understand its contents.

- Where the request relates to health information we are required to consult a medical practitioner, consult DPO for details.

## INTRODUCTION

### 1. **What is the purpose of this Policy and Procedure Document?**

- 1.1 The Mental Health Commission (“**MHC**”) is required to comply with its obligations under the General Data Protection Regulation (“**GDPR**”) and The Data Protection Act 2018 (“**DPA**”). This includes the obligation to facilitate individual data subjects in exercising his/her Data Subject Rights (“**DSRs**”) which comprises the Right of Access, Right to Rectification, Right to Erasure, Right to Restriction and Right to Object (as defined further in paragraph 4 below).
- 1.2 This Policy and Procedure Document (“**Document**”) is intended to provide guidance to the MHC staff who either have responsibility for dealing with DSR Requests (“**DSRRs**”) or who are asked to assist in dealing with DSRRs to ensure DSRRs are dealt with in a lawful, consistent, and proportionate manner.
- 1.3 Terms such as Personal Data, Data Subject, Processing, Controller and Processor which are used in this Document have the meaning, set out in the GDPR.

### 2. **Lawful Basis for MHC Processing Operations**

- 2.1 Prior to setting out how the MHC deals with DSRRs, it is important to note the purpose for which the MHC was created and the statutory purposes it was established to achieve. The Mental Health Commission was established under the Mental Health Act 2001 to promote, encourage, and foster high standards and good practices in the delivery of mental health services in Ireland. In addition, the MHC is also responsible for the establishment and functioning of the Decision Support Service (DSS) under the Assisted Decision (Capacity) Act 2015. The duties of the DSS include, but are not limited to, the registration and supervision of decision support arrangements, to maintain a panel of experts who will act as decision-making representatives, special and general visitors, and to investigate complaints made under the 2015 Act.
- 2.2 The lawful bases underpinning the Processing of Personal Data by the MHC and the DSS are primarily grounded in Art. 6(1)(e) of the GDPR which permits processing which is *“necessary for the performance of a task in the public interest or in the exercise of official authority vested in the Controller.”* Further details on the legal bases relied upon by the MHC are set out in the MHC Privacy Policy.
- 2.3 The nature of the Personal Data processed by the MHC is set out in the Privacy Policy.

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### 3. What are Data Subject Rights/DSRs?

3.1 Under the GDPR and the DPA natural persons (not corporates) are granted certain Data Subject Rights (“DSRs”) which can be exercised in respect of Controllers who keep their Personal Data. Where the MHC is a Controller of Personal Data relating to identified or identifiable natural persons, the MHC is obliged to facilitate the exercise of these rights. The relevant DSRs that apply to the MHC are:

DSR	GDPR Reference
Access Right	The right of the Data Subjects conferred by Art 15 of the GDPR to access their Personal Data.
Right to Rectification	The right of the Data Subjects to have inaccurate Personal Data rectified as set out in Art 16 of the GDPR.
Right to Erasure	The right of Data Subjects to have Personal Data erased in the circumstances provided for in Art 17 of the GDPR.
Right to Restriction	The right of Data Subjects to have Personal Data marked or restricted with the aim of limiting their processing in future in the circumstances set out in Art 18 GDPR.
Right to Object	The right of Data Subjects to object on certain grounds to the processing of Personal Data as set out in Art 21 GDPR

3.2 Data Portability: Article 20 of the GDPR provides a right to data portability in cases where a Controller is Processing Personal Data on the basis of the consent of the Data Subject (Article 6(1)(a) of GDPR) or on the basis of contractual necessity (Article 6(1)(b) of GDPR). In any event, Art. 20(3) of the GDPR specifically provides that the right to portability does not apply to Processing which is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller (As per Article 6(1)(e) of the GDPR) Thus, in the event of a Subject Access Request for any data that is processed which relies upon Article 6(1)(a) or (b) as the legal basis of processing, shall be subject to Article 20 of GDPR unless it can be demonstrated that Article 6(1)(e) also applies as the legal bases. Should Article 20 apply then the MHC is required to provide data to a requestor in a manner that is structured, commonly used and machine-readable. The provision of data should also facilitate the right of the data subject to transmit their data to another controller without hindrance from the MHC.

3.3 Right not to be Subject to Automated Decisions N/A to the MHC: Art. 22 GDPR provides Data Subjects with a right not to be subject to decisions based solely on automated processing where those decisions produce legal effects or similarly significantly affect the Data Subject. As the MHC does not

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make such decisions without significant human intervention, this right does not apply.

- 3.4 DSRs apply to Personal Data held by the MHC in both an electronic and manual form, i.e. structured files.<sup>1</sup>

#### 4. What is 'Personal Data'?

4.1 DSRs only apply to Personal Data which means any information relating to an identified or identifiable natural person ("**Data Subject**"). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. Personal Data includes the most basic personal information such as name, address, contact phone number, PPS number or other identifiers such as medical record numbers (MRNs). However, data is not automatically Personal Data because it is retrievable by a person's name or account identifier. The data should specifically relate to the individual to be considered Personal Data.

4.2 The following are examples of what does **NOT** constitute personal data relating to a Data Subject who lodges a DSRR:

- (a) information relating to a company or enterprise in which the individual is involved;
- (b) information from which a third party other than the Data Subject is identifiable; and
- (c) anonymous data, i.e. where it is not possible to identify the individual from the data.

4.3 Pseudonymised data constitutes personal data (e.g. regulatory or inspection files using an MRN or initials and date of birth rather than a resident's name). However, such data does not fall within the scope of a DSRR as the MHC is unable to identify a match for such data on the basis of a data subject's request and such data is not retrievable in response to a request without obtaining additional Personal Data from the requestor. To do so would require the MHC to obtain additional Personal Data from the requester which it would not otherwise have, solely for the purpose of complying with a request. Article 11 of the GDPR states that a controller shall not be obliged to acquire or process additional personal data in order to identify the data subject for the sole purpose of complying with its obligations under the GDPR. In the event

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<sup>1</sup> Art 4(6) GDPR. 'Filing system' is defined in Art 4(6) as 'any structured set of personal data which are accessible according to specific criteria, whether centralised, decentralised or dispersed on a functional or geographical basis'.

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that the requester (being a resident or service user (or former resident or service user) of an Approved Centre) requests to the MHC to furnish copies of Personal Data from the Inspectorate or Standards and Quality Assurance (S&QA) files in relation to an Approved Centre, the requester should be directed to request these records from the Approved Centre in question where the MHC only holds pseudonymised Personal Data on its files. Please see Section 6.2 of this Policy.

- 4.4 It is important to note that within one document, there may be sections that constitute Personal Data and other sections which do not (e.g. the Access Right applies to Personal Data relating to living individuals only).
- 4.5 In assessing the scope of the definition of 'Personal Data', regard should be given to the emerging case law of the Court of Justice of the European Union and guidance issued by the Article 29 Data Protection Working Party, 2010 from time to time.<sup>2</sup>
- 4.6 Importantly, only the relevant Data Subject, or someone acting on behalf of the Data Subject, can make a DSRR. A Data Subject is the identifiable natural person who is the subject of the Personal Data. In the MHC's case, Data Subjects who may make a DSRR may include individuals who are identified in a personal capacity in decisions relating to the detention of a patient or the appointment of members of mental health tribunals. Where individuals are mentioned in passing in a document or where his/her name appears only in an official capacity (e.g. as a court-appointed guardian), the data will not ordinarily be Personal Data requiring review on foot of a DSRR.

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<sup>2</sup> Examples *YS v. Minister voor Immigratie, Integratie en Asiel*, and *Minister voor Immigratie, Integratie en Asiel v M and S* (Joined Cases C-141/12 and C-372/12; *Peter Nowak v Data Protection Commissioner* (Case C-434/16).

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## 5. Scope of DSRRs

DSR	Scope	Comment
<p><b>Access (Art 15)</b></p>	<p>Whether or not Personal Data are being processed;</p> <p>If so, access to the Personal Data; plus:</p> <ul style="list-style-type: none"> <li>• the purposes of the Processing;</li> <li>• the categories of Personal Data concerned;</li> <li>• the recipients or categories of recipient to whom the Personal Data have been or will be disclosed;</li> <li>• where possible, the envisaged period for which the Personal Data will be stored, or, if not possible, the criteria used to determine that period;</li> <li>• the existence of the Rights of Rectification, Restriction Erasure and Objection;</li> <li>• the right to lodge a complaint with the Data Protection Commission;</li> <li>• where the Personal Data are not collected from the Data Subject, any available information as to their source;</li> <li>• the existence of automated decision-making (n/a to the MHC).</li> </ul>	<p>The MHC shall provide a copy of the Personal Data undergoing Processing (not necessarily copies of documents but an extract from the document which contains the Personal Data will suffice). Where the Data Subject makes the request by electronic means, and unless otherwise requested by the Data Subject, the information shall be provided by email.</p> <p>See the MHC Privacy Policy for details of these points.</p>
<p><b>Rectification (Art 16)</b></p>	<p>The right to have inaccurate Personal Data rectified and incomplete data completed.</p> <p>Art. 19 GDPR requires the Controller to communicate any rectification or erasure of Personal Data or Restriction of Processing to each recipient to whom the Personal Data have been disclosed,</p>	<p>Art. 5(1)(d) of the GDPR applies the principle that <i>“every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay”</i>.</p>

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	<p>unless this proves impossible or involves disproportionate effort. The Controller shall inform the Data Subject about those recipients if the Data Subject requests it.</p>	<p>The extent to which a Rectification request proves impossible or involves disproportionate effort requires a case by case assessment.</p> <p>In cases where the accuracy or completeness of Personal Data is contested or if the Personal Data may be required for subsequent reference (e.g. as evidence in litigation or for investigations), the MHC may preserve the original record and append a supplementary statement to its files (as permitted by Art. 16 of the GDPR). The above record will be retained as per the MHC Retention Policy.</p>
<p><b>Erasure (Art 17, 19)</b></p>	<p>The right to have Personal Data erased where one of the following grounds applies:</p> <ul style="list-style-type: none"> <li>• the Personal Data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;</li> <li>• the Data Subject withdraws consent;</li> <li>• the Data Subject exercises the Right to Object and there are no overriding legitimate grounds for the Processing;</li> <li>• the Personal Data have been unlawfully processed;</li> <li>• the Personal Data have to be erased for compliance with a legal obligation on the MHC.</li> </ul> <p>Art 17(2) requires that where the MHC has made Personal Data public and has complied with the Right to Erasure, taking account of available technology and the cost of implementation, the MHC shall take reasonable steps,</p>	<p>The MHC has formulated a Data Retention Policy which identifies the appropriate timeframes for which the Personal Data is retained and then deleted. DSRs relating to the Right of Erasure must be read in light of this policy</p> <p>Withdrawal of consent is normally only applicable to the MHC if the MHC relies exclusively on consent as a lawful basis for processing Personal Data.</p> <p>Art. 17(2) is not normally applicable to the MHC as the MHC does not publish Personal Data.</p>

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	<p>including technical measures, to inform Controllers which are Processing the Personal Data that the Data Subject has requested the erasure by such Controllers of any links to, or copy or replication of, those Personal Data.</p>	<p>The Right to Erasure does not apply if the retention of the Personal Data by the MHC is necessary for:</p> <ul style="list-style-type: none"> <li>(a) exercising the right of freedom of expression and information;</li> <li>(b) compliance with a legal obligation on the MHC; or</li> <li>(c) for the performance of a task carried out in the public interest or in the exercise of official authority vested in the MHC;</li> <li>(d) for certain limited archiving purposes in the public interest;</li> <li>or</li> <li>(e) for the establishment, exercise or defence of legal claims.</li> </ul> <p>Requests for the Right to Erasure will be assessed on a case by case basis in light of the exceptions at (b), (c) and (e) above.</p>
<p><b>Restriction (Art 18, 19)</b></p>	<p>The right to restriction of Processing where one of the following applies:</p> <ul style="list-style-type: none"> <li>• the accuracy of the Personal Data is contested by the Data Subject, for a period enabling the MHC to verify the accuracy of the Personal Data;</li> <li>• the Processing is unlawful and the Data Subject opposes the erasure of the Personal Data and requests the restriction of their use instead;</li> <li>• The MHC no longer needs the Personal Data but it is required by the Data Subject for the establishment, exercise or defence of legal claims;</li> <li>• the Data Subject has exercised the Right to Object pending the verification whether the legitimate grounds of the</li> </ul>	<p>Art 18(2) requires that where Processing has been restricted such Personal Data shall, with the exception of storage, only be Processed with the Data Subject's consent for the establishment, exercise or defence of legal claims for the protection of the rights of another natural or legal person or for reasons of important public interest. For example, if the data is required to be processed in connection with an on-going or pending audit or statutory report, investigation, grievance, complaint, litigation or legal dispute, the MHC is likely to refuse the request.</p> <p>A Data Subject who has obtained restriction of Processing shall be informed by the Controller before the restriction of processing is lifted (Art 18(3)).</p>

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	Controller override those of the Data Subject.	
<b>Objection (Art 21)</b>	<p>The right to object, on grounds relating to his or her particular situation, at any time to Processing of Personal Data concerning him or her which is based on “public interest” legal basis in Art 6(1)(e) (i.e. processing for the purpose of statutory functions).</p> <p>Separate right to object to direct marketing (generally N/A to the MHC).</p> <p>Where personal data are processed for scientific or historical research purposed or statistical purposes pursuant to Article 89(1), the Data Subject, on grounds relating to his or her particular situation, shall have the right to object to Processing of Personal Data concerning him or her, unless the Processing is necessary for the performance of a task carried out for reasons of public interest (generally N/A to the MHC).</p>	<p>The Controller shall no longer process the Personal Data unless the Controller demonstrates compelling legitimate grounds for the Processing which override the interests, rights and freedoms of the Data Subject or for the establishment, exercise or defence of legal claims (in which case it may refuse the objection).</p> <p>As this right is exercisable based on the Data Subject’s particular situation that entitle him or her to object to the Processing of Personal Data by the MHC, when the MHC receives a Right to Object request, it will be assessed on its merits. If the Data Subject refuses to provide the particular grounds on which s/he is objecting, the MHC will refuse the objection.</p> <p>The MHC does not undertake direct marketing activity. However, if a Data Subject objects to the receipt of communications which may constitute direct marketing (which right of objection is absolute), the MHC will comply with the objection and remove the Data Subject from future mailing lists.</p>

## 6. Exceptions to DSRs – General

### 6.1 Legal Privilege

(a) DSRs will not apply where:

- (i) Personal Data is Processed for the purpose of seeking, receiving or giving legal advice;
- (ii) legal privilege may apply to the Personal Data such as in communications between a

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client and his or her legal advisors or between advisors; or

- (iii) granting the request would constitute a contempt of court.<sup>3</sup>

## 6.2 Unable to Identify the Data Subject

- (a) Where the MHC is unable to identify a Data Subject who has made a DSRR, the MHC is obliged to inform the Data Subject accordingly, if possible.<sup>4</sup> Unless the Data Subject provides additional information enabling his or her identification, the MHC is not required to respond to the DSRR. For instances in which a requestor is not the Data Subject but is acting their behalf, the MHC must request adequate evidence from the Data Subject that the requestor is authorised to act on their behalf. However, if no action is taken, the response to the Data Subject must point out the possibility of making a complaint to the Data Protection Commission and to the possibility of seeking a judicial remedy.<sup>5</sup>

## 6.3 DSRRs which are Manifestly Unfounded or Excessive

- (a) Where DSRRs are manifestly unfounded or excessive, in particular because of their repetitive character, the MHC may either (a) charge a reasonable fee taking into account the administrative costs of dealing with the DSRR (including for additional copies of the same Personal Data); or (b) refuse to act on the DSRR.<sup>6</sup> The burden of demonstrating the manifestly unfounded or excessive character of the request rests with the MHC.

## 7. **Restrictions on DSRs – General**

7.1 The DPA outlines a number of circumstances in which a DSR may be restricted where necessary and proportionate to those circumstances. The MHC may refuse to comply with a DSR pursuant to one or more of the restrictions below. However, the MHC is required to inform the Data Subject of the decision within one month of the request.

- (a) Legal proceedings

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<sup>3</sup> Section 162(b) of the DPA

<sup>4</sup> Art 11(2) GDPR.

<sup>5</sup> Art 12(4) GDPR.

<sup>6</sup> Art. 12(5) GDPR.

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- (i) Where there are current or future legal proceedings either before a court, tribunal, statutory body or an administrative out-of-court procedure (including a Tribunal hearing or any appeal), or where the Personal Data is being processed for the establishment, exercise or defence of, a legal claim or prospective legal claim, DSRs may be restricted.<sup>7</sup> This is different to circumstances in which legal privilege would apply and the Personal Data will be exempt from DSRRs.
- (b) Debt is owed to a Public Body<sup>8</sup>
- (i) The MHC may choose not to comply with a DSRR where to comply with the request would interfere with the administration of any tax, duty or other money due or owing to the State or a local authority in any case in which the exercise of the DSRR would be likely to prejudice this.
- (c) Investigation of criminal offences
- (i) The MHC may choose not to comply with a DSRR where to do so would interfere with the prevention and detection of criminal offences or the investigation or prosecution of criminal offences and the execution of criminal penalties.<sup>9</sup>
- (d) Court proceedings, national security and defence
- (i) The MHC may choose not to comply with a DSRR where the disclosure of Personal Data to a Data Subject would necessarily prejudice cabinet confidentiality, judicial independence and court proceedings, parliamentary privilege, national security, defence, and the international relations of the State.<sup>10</sup>
- (e) Enforcement of a civil claim
- (i) Where the Personal Data is processed for the enforcement of a civil law claim (including matters relating to the liability of the MHC or its service providers in respect of damages,

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<sup>7</sup> Section 60(3)(a)(iv) of the DPA.

<sup>8</sup> Section 60(3)(a)(iii) of the DPA.

<sup>9</sup> Section 60(3)(a)(ii) of the DPA.

<sup>10</sup> Section 60(3)(a)(i) of the DPA.

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compensation or other liabilities or debts related to the claim), it may be necessary to restrict the DSRR.<sup>11</sup>

(f) Estimating Liability

- (i) The MHC may refuse to comply with a DSRR where the Personal Data is processed for the purposes of estimating the amount of the liability of a controller on foot of a claim for the payment of a sum of money, whether in respect of damages or compensation, where to comply with the DSRR would prejudice the interests of the MHC in relation to the claim.<sup>12</sup>

(g) Expressions of Opinion given in Confidence

- (i) Where the Personal Data relating to the requester consist of an expression of opinion about him or her by another person given in confidence or on the understanding that it would be treated as confidential to a person who has a legitimate interest in receiving information, such Personal Data consisting of that opinion, shall be refused.<sup>13</sup>

(h) Data kept for archiving purposes in the public interest, scientific or historical research or statistical purposes

- (i) Where data is kept for archiving purposes in the public interest, scientific or historical research or statistical purposes the MHC may choose not to comply with a DSRR to the extent that the exercise of the rights would be likely to render impossible or seriously impair the purpose for which the data is kept or where restriction is necessary for the fulfilment of those purposes.<sup>14</sup>

(j) Records submitted under the Protected Disclosures Act 2014 (as amended)

Where data was submitted to a reporting body under the Protected Disclosures Act 2014 (as amended) Data Subject Rights may

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<sup>11</sup> Section 60(3)(a)(v) of the DPA.

<sup>12</sup> Section 60(3)(a)(vi) of the DPA.

<sup>13</sup> Section 60(3)(b) of the DPA.

<sup>14</sup> Section 61(1) of the DPA.

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be restricted to the extent necessary and proportionate for the purposes of—

(I) safeguarding the important objectives of general public interest,

(II) the protection of the data subject or the rights and freedoms of others,

(iii) to the extent, and as long as, necessary to prevent and address attempts to hinder reporting or to impede, frustrate or slow down follow-up, in particular investigations, or attempts to find out the identity of reporting persons.

Where this restriction applies to a request made by a Data Subject. The Mental Health Commission shall communicate as such to the requestor concerned unless doing so would necessitate the disclosure of information that might identify the reporting person or prejudice the effective follow-up, including any investigation, of the relevant wrongdoing concerned or prejudice the achievement of any of the important objectives of general public interest.

Section 6 of the 2014 Act states that where information was disclosed in the course of obtaining legal advice and where a claim to legal professional privilege could be made, said disclosure will not be subject to the protections under the 2014 Act.

## 7.2 The Data Subject already had the Personal Data

- (a) Where the Data Subject has already been provided by the MHC with a copy of the Personal Data, the MHC may impose a reasonable fee based on administrative costs for a copy of the same Personal Data.

## 7.3 Providing a copy which adversely affect the rights and freedoms of others

- (a) Pursuant to Art. 15(4) GDPR, the MHC is not required to provide a copy of Personal Data where it would adversely affect the rights and freedoms of others. The GDPR Recitals provide some examples of the types of rights and freedoms that may fail to be considered including trade secrets, intellectual

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property, respect for private and family life, home and communications, freedom of thought, conscience and religion, freedom of expression and information, freedom to conduct a business, the right to an effective remedy and to a fair trial, and cultural, religious and linguistic diversity.<sup>15</sup> Where a copy of Personal Data includes information capable of revealing the identity of another individual or which otherwise affects the privacy rights of that individual, the MHC will not provide the Data Subject with this information and will instead provide a summary of the Personal Data with the other individual's information redacted. This is unless the other individual has consented to the provision of his/her Personal Data.

**8. What do I do if I receive a Data Subject Access Request (DSAR)?**

8.1 See Decision Tree/Process in the Appendix

**9. Complaints to the Data Protections Commission**

9.1 In circumstances where a Data Subject is not happy with the way in which the MHC has dealt with a DSRR received from the Data Subject, s/he has a right to complain to the Data Protection Commission ("**DPC**"). The DPC has extensive powers of investigation and enforcement. All correspondence received from the DPC should be provided to the MHC Data Protection Office ("**DPO**") as soon as possible.

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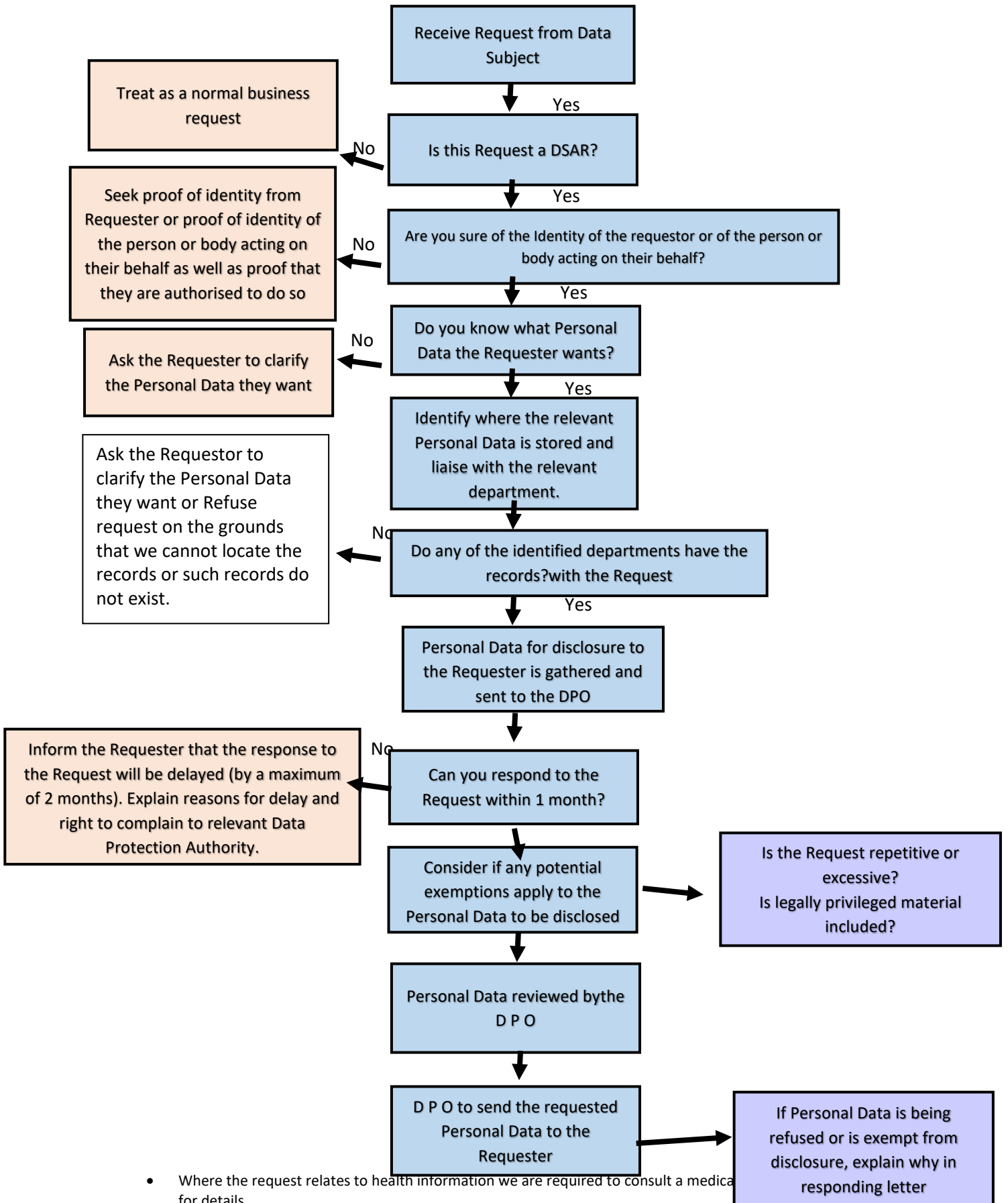
<sup>15</sup> See Recital 4 GDPR.

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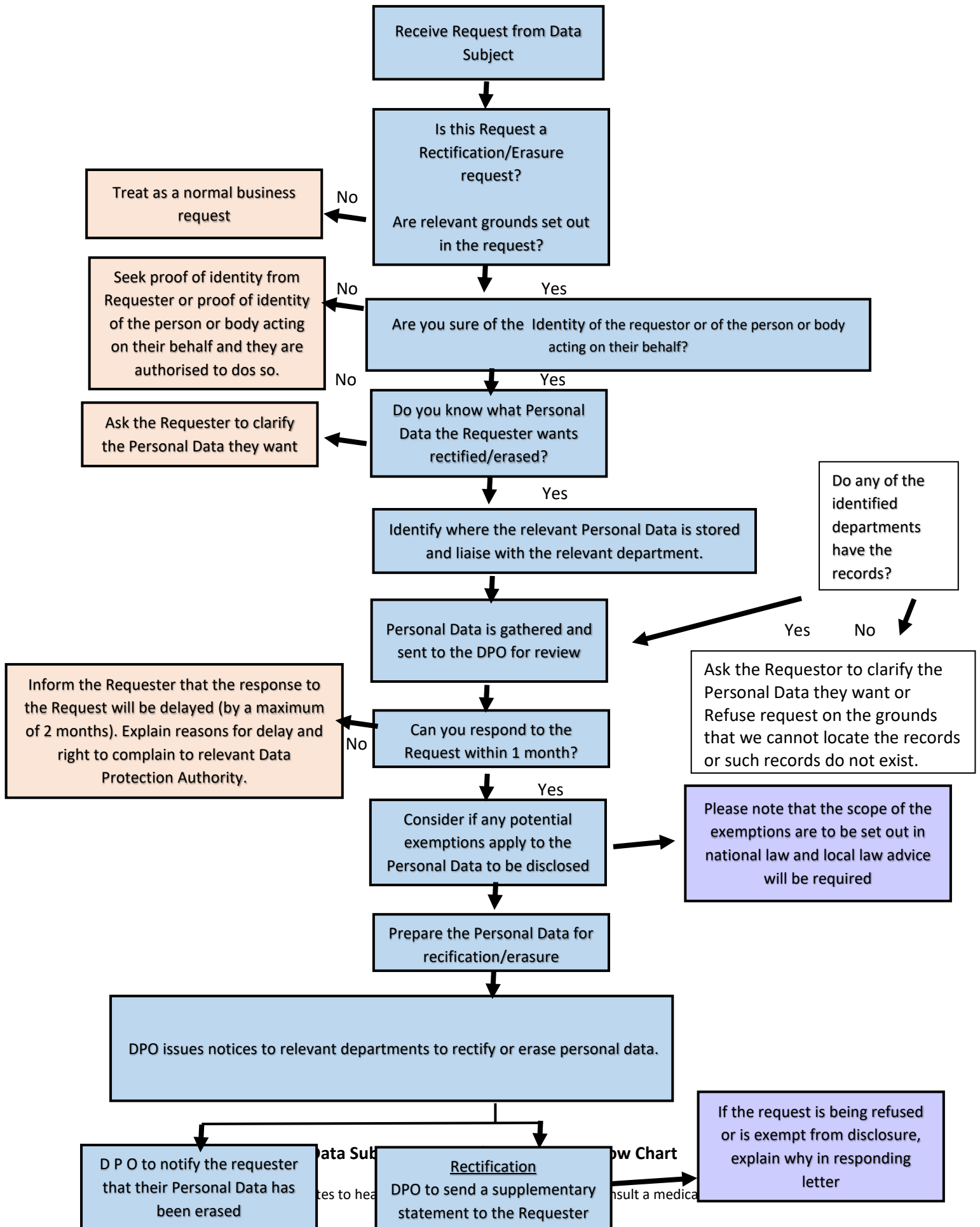


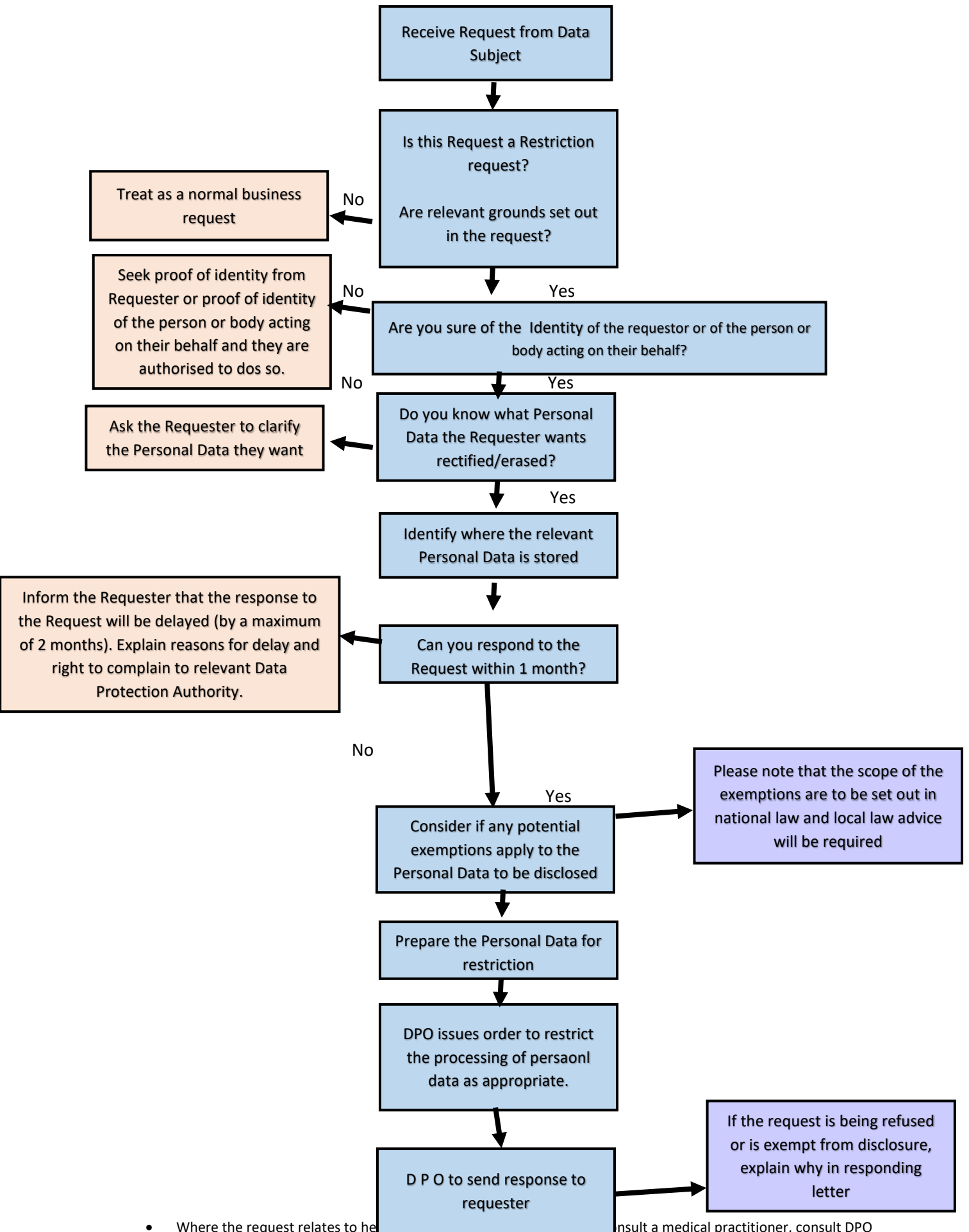
# SCHEDULE 1

## Data Subject Access Request Flow Chart



### Data Subject Rectification/Erasure Request Flow Chart





- Where the request relates to health data, consult a medical practitioner, consult DPO for details.