



Using Lamplight for Requests for Personal Data and Data Portability

Requests for personal data

Overview

Under the GDPR, when you are processing personal data about somebody, that person has a right of access to their data (Article 15). They have a right to request information about the data you hold on them. If a person makes such a request, then, under the new rules, you need to supply them with certain information.

The Information Commissioner's Office supplies a detailed checklist of what you need to do and the information you need to provide. It can be found at the following address: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-be-informed/>. You should consult this information and the text of the GDPR.

The relevant part of the GDPR are Article 12-15 and Recitals 60 – 64

How can Lamplight help?

Where you store information about the data subject in Lamplight, you will need to be able to extract that information to provide them with a copy.

Lamplight is a highly flexible system and used by different customers in different ways which will have implications for the best way to provide information to the subject. The nature of the information stored or the way this might touch on the profiles of other people may differ between our clients' different systems. Data subjects might also request different aspects of their information, from their profile data to information about the work that you have done with them or the outcomes that they have achieved. Data subjects might also express a preference for paper copies or an electronic version of the data. This means that the best way to extract information in fulfilling a request for personal data may be a combination of processes in Lamplight.

This document sets out the different processes that you can use to extract personal data from Lamplight.

Viewing the profile

Any information that is held in Lamplight about a data subject should be linked to their profile. Each data subject should only have one profile in Lamplight. To find the profile, use the search box in the top right-hand side of the screen.



Start typing the first name of the data subject requesting their information. As you type, you will see the names that match that search appear. Simply select the name of the person you wish to view.

Printing the full profile in pdf or paper form

Where the information does not need to be provided in machine-readable format, you can download a pdf document or produce a paper report of the information held in the profile.

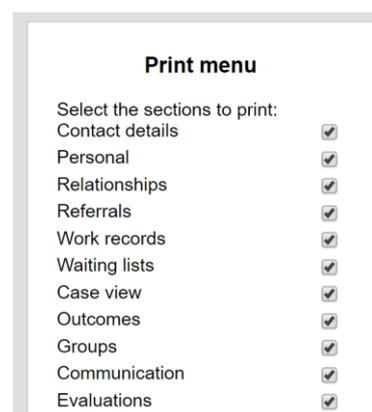


To do this, click the PRINT button on the top right-hand side of the profile. This will open a new window.

On the right hand side of the new window, there is a print menu where you can select the information that you wish to print. Deselect the tabs that you do not wish to provide in the document.

You can print each tab on a separate page or collapse them into a single continuous document as one page.

You can choose whether to print to paper or pdf by selecting the appropriate option from your print dialogue box.



When might this be inappropriate?

This will not be the best way to provide information if you wish to have it in a machine-readable format.

Printing details of the work that has been done with the data subject in this way may be inappropriate if work records contain information on other data subjects in addition to the person making the request. The relationships table may also contain identifying information about people that the data subject is linked to in the system. This information should not normally be disclosed without the consent of the other data subjects.

Other ways to extract full information

There are three stages involved in extracting full information on a person who has made a request for their personal data under Article 15 of the GDPR from Lamplight:

1. Extracting Profile Field Data – this is the information that is entered into the contact and custom tabs and fields in the data subject's profile.
2. Extracting information from the tables of records in the data subject's profile
3. Managing the tables to put them into an accessible form or to redact any references to other data subjects or data that should not be shared with the data subject.

The data can then be combined with any further information that it is the duty of the controller to supply and securely transferred to the data subject.

Extracting profile data

The most effective way to do this is to set up a series of List Data Views (also known as Group Data Views) which contain the fields from each of the profile tabs. You may need several for each profile type depending on the number of fields you have.

If these are given titles which make it clear that they are for answering requests for data then they can be used whenever a request is received and do not need to be set up each time. You will need to ensure that they are kept up to date and changed if additional fields are added to the database.

With this pre-set range of data views, you can be ready should any requests be made.

On receiving a request, you will need to create a manual group/list containing only the profile for the individual who is the subject of the request.

Once you have created this list, you should open it using one of the list data views that you have prepared.

This will show a table containing the information from their profile which you have selected.

Above the table you can select to show 'all' records on one page, then below the table click Download and a CSV file will be downloaded to your computer or the destination you specify.

You may need to repeat this until all the tabs and field information has been downloaded – this is where there are multiple data views needed.

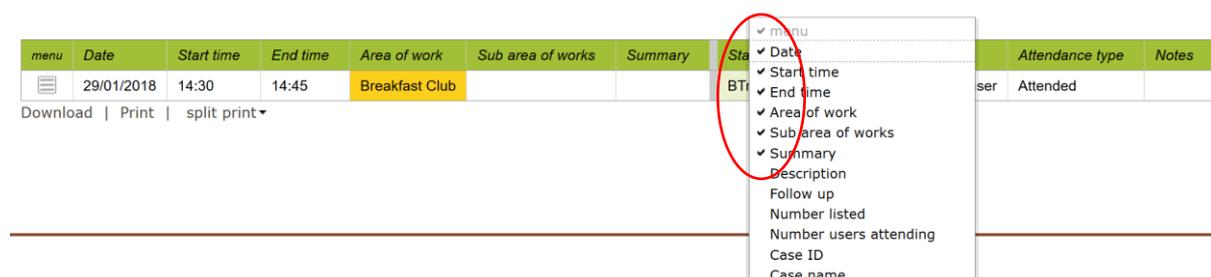
Extracting records data

Once you have all the information out of the profile for the data subject you can download the information needed about the work you have done, the referrals made, communications received and sent and any outcomes etc.

You will need to open the profile, identify which of the tables you will be downloading and select the relevant tab. This might be Relationships, Referrals, Work Records, Outcomes and Evaluations for example.

There are two ways in which the data might be displayed. You simply see all the records of that type in a table, or you might see a search bar with the table underneath.

If you just see a table, you can select which columns you wish to download to send to the person making the request by right-clicking on the table header row. This will show you a list of all available columns. Make sure only those you wish to download are ticked.



menu	Date	Start time	End time	Area of work	Sub area of works	Summary	Sta	ser	Attendance type	Notes
☰	29/01/2018	14:30	14:45	Breakfast Club			BT		Attended	

Download | Print | split print ▾

- menu
- Date
- Start time
- End time
- Area of work
- Sub area of works
- Summary
- Description
- Follow up
- Number listed
- Number users attending
- Case ID
- Case name

If you see a search bar, you can manage what you are going to download by adding search filters and additional data columns. Click on the search bar to see all the search and data column options.

The screenshot shows a search interface with a table of records. The table has the following columns: menu, Date, Start time, End time, Area of work, Sub area of works, Summary, Staff, Location, Role, Attendance type, and Notes. A single record is displayed with the following data: Date: 29/01/2018, Start time: 14:30, End time: 14:45, Area of work: Breakfast Club, Staff: BTre, GSma, Role: Service user, Attendance type: Attended. The 'Show all' dropdown menu is circled in red, and the 'Download' button is also circled in red. A red arrow points to the search bar area.

Once you are happy that you have all the relevant information in the table, make sure that it is set to show 'all', then click the download button at the bottom. This will download a CSV file.

This process can be repeated for each type of record.

Managing the extracted tables

Once all the files are downloaded, you can combine these by creating multiple worksheets in your spreadsheet programme and saving as a spreadsheet (not as a CSV file).

At this point you can apply any formatting or styling which your internal processes require so that the data is presented how you need it to be.

You should check that all the data to be transmitted is specific to the data subject and does not include personal information for any other data subjects. This is particularly important where you run group sessions at which data is captured on the individuals who attend.

This file can then be securely transmitted to the client. You should be aware that email is not a secure method of transmitting information.

Dealing with personal data in group work

Sometimes you will be capturing information about single individuals while running a session with multiple clients. For example, if you run a drop-in or a session where you record observations about clients' interactions or conversations you have had with them.

This information is often recorded in the description or follow-up field. However, this would risk being transmitted as part of the request for personal data and disclosed inappropriately.

In order to reduce this risk, you may wish to make use of the notes column in the attendance tab of the work record, or introduce custom columns here.

New work record

1. When and where 2. Attendance 3. Details 4. Tasks 5. Expenses 6. Charges 7. Media

Find users add new people to database

Jump to 1 | << first | 1 | last >> | (1 of 1) | Show 10 | per page

ID	Name	ID	Attendance type	Role	Notes	Resource Given	Travel	Certificate awarded?	del
1514	Hermione Granger		Attended	Service user					X
87	Sam Samuels		Attended	Staff					X

Information which is unique to the individual can then be entered in that column and the description field reserved for generic information about the session and the events observed.

The content of the notes column can be displayed in each individual's work record tab table, and downloaded with the rest of the information.

Search

Click to change filters to see more or fewer records.

Jump to 1 | << first < prev | page: 1 | next > last >> | (1 of 1) | Show 25 | per page | Total of 1 records

menu	Date	Start time	End time	Area of work	Sub area of works	Summary	Staff	Location	Role	Attendance type	Notes
	29/01/2018	14:30	14:45	Breakfast Club			BTre, GSma		Service user	Did not attend	
Total this page											

Download | Print | split print

Add