IAF Subject Access Request (SAR) Policy & Procedure

1. Purpose

This policy explains how the Inspire and Achieve Foundation (IAF) handles **Subject Access Requests (SARs)** in line with:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- ICO guidance

A SAR is a request from an individual to access the personal data IAF holds about them. IAF is committed to responding clearly, lawfully, and within statutory timeframes.

2. Scope

This policy applies to:

- All staff, volunteers, trustees, and contractors
- All personal data held by IAF in any format (electronic, paper, audio, images, messaging platforms, cloud storage)
- All beneficiaries, staff, volunteers, and other individuals whose data IAF processes

3. What is a Subject Access Request?

A SAR is a request from an individual asking for:

- Confirmation that IAF processes their personal data
- Access to that data
- Copies of the data
- Supplementary information about how their data is used

A SAR can be made:

- In writing
- By email
- Verbally
- Through a representative (with written authority)

There is **no special wording required**. If someone says "I want to see the information you hold about me", this counts as a SAR.

4. How to Make a SAR

Individuals can make a SAR by contacting:

✉@ **craig.stevens@inspireachieve.co.uk**
📍 **159 Yorke Street, Mansfield, NG19 9NJ**

IAF may ask for clarification if the request is broad or unclear, but we will not delay starting the process.

5. Identity Verification

IAF must confirm the identity of the requester before releasing any personal data.

We may ask for:

- Photo ID (passport, driving licence)
- Proof of address
- Additional verification if the request is sensitive

If a request is made on behalf of someone else, written authorisation is required.

The statutory timeframe does not begin until identity is verified.

6. Timeframe for Responding

IAF will respond to SARs:

- **Within one month** of receiving the request
- With a possible **two-month extension** for complex or multiple requests

If an extension is needed, the requester will be informed within the first month.

SARs are **free of charge**, unless the request is manifestly unfounded or excessive.

7. What Information Will Be Provided

IAF will provide:

7.1 Personal data

Any information relating to the individual, including:

- Contact details
- Notes and assessments
- Attendance records
- Risk information
- Emails or messages that identify the individual
- Employment or volunteering records

7.2 Supplementary information

As required by UK GDPR, including:

- Purposes of processing
- Categories of data
- Recipients of data
- Retention periods
- Rights of the individual
- Source of the data (if not collected directly)
- Details of automated decision-making (if any)

8. Exemptions

Some information may be withheld if an exemption applies under the Data Protection Act 2018. Examples include:

8.1 Third-party data

We cannot disclose information about other people unless:

- They consent, or
- It is reasonable to do so

8.2 Safeguarding

Information may be withheld if disclosure would:

- Cause serious harm to the individual or another person
- Undermine safeguarding investigations

8.3 Legal privilege

Information protected by legal professional privilege cannot be disclosed.

8.4 Management information

Internal planning or management forecasts may be exempt.

8.5 Crime and taxation

Information may be withheld if disclosure would prejudice:

- Crime prevention
- Detection or investigation
- Law enforcement

IAF will explain the reason for any withheld information unless doing so would itself cause harm.

9. Locating and Preparing the Data

Once a SAR is received, the Data Protection Lead will:

1. Log the request
2. Verify identity
3. Notify relevant staff
4. Locate all data across:
   - SharePoint
   - Email accounts
   - Case management systems
   - Paper files
   - Messaging platforms (if used for work)
5. Review data for:
   - Accuracy
   - Third-party information
   - Exemptions
6. Redact where necessary
7. Prepare the response pack

All staff must cooperate fully and promptly.

10. Format of the Response

IAF will provide the response:

- Electronically (secure email or encrypted file), or
- In paper format if requested

The response will include:

- A cover letter explaining the request
- Copies of the personal data
- A summary of supplementary information
- Details of any withheld information and the legal basis

11. Record Keeping

IAF will maintain a **SAR Log** including:

- Date received
- Identity verification date
- Summary of request
- Actions taken
- Date of response
- Any exemptions applied
- Staff involved

SAR records are retained for **three years**.

12. Responsibilities

Data Protection Lead

- Oversees the SAR process
- Ensures legal compliance
- Reviews exemptions
- Signs off the final response

Staff and Volunteers

- Must forward SARs immediately
- Must assist in locating data
- Must not delete or alter records after a SAR is received

Trustees

- Provide oversight and ensure accountability

13. Complaints

If an individual is unhappy with how their SAR was handled, they can complain to:

- **IAF Director or the Data Protection Lead**
- **IAF Chairperson**
- **Information Commissioner's Office (ICO)**

IAF will respond to complaints promptly and transparently.