



Data Subject Access Request (SAR) Procedures & SAR Form

1. Introduction

St Pauls Advice Centre is committed to being open and transparent about the personal information we hold and how we use it. Individuals have the right to know whether we hold personal information about them, to access that information and to understand how it is being processed.

This procedure explains how individuals can make a Subject Access Request (SAR) and how St Pauls Advice Centre will respond. It should be read alongside the Data Protection and Information Governance Policy, Data Retention and Erasure Policy and Privacy Notice.

We recognise that responding to Subject Access Requests is an important part of maintaining trust, protecting individual rights and demonstrating accountability. We are committed to handling every request fairly, consistently and securely, while protecting the confidentiality and rights of other individuals.

This procedure applies to all personal information held by the organisation regardless of format, including electronic records, paper files, emails, AdvicePro records, archived information and information processed on our behalf by third-party service providers.

2. Legislative Framework

This procedure has been developed in accordance with:

- UK General Data Protection Regulation (UK GDPR);
- Data Protection Act 2018;
- Data (Use and Access) Act 2025;
- relevant guidance issued by the Information Commissioner's Office (ICO).

The organisation is committed to processing personal information lawfully, fairly and transparently, ensuring that individuals are able to exercise their information rights while balancing the rights and freedoms of others where required by law.

3. What is Personal Information?

Personal information (also known as personal data) is any information relating to an identified or identifiable living individual. This includes information that can identify someone directly, such as their name or address, or indirectly when combined with other information.

St Pauls Advice Centre processes personal information in order to provide advice services, support staff and volunteers, meet legal and regulatory obligations and carry out its charitable activities. We are committed to ensuring that all personal information is managed securely and in accordance with data protection legislation.

Further information on what constitutes personal information and your rights under the data protection regulation and laws can be found on the Information Commissioners Office (ICO) [website](#).

4. The Right of Access

Under Article 15 of the UK GDPR, individuals have the right to obtain confirmation that their personal information is being processed and, where this is the case, to receive a copy of that information together with other information about how it is being used.

Where a valid Subject Access Request is received, St Pauls Advice Centre will normally provide:

- the purposes of the processing
- the categories of personal data concerned
- the recipient(s) or categories of recipient(s) to whom the personal data have been or will be disclosed
- If the data has been transferred to a third country or international organisation(s) (*and if applicable, the appropriate safeguards used*)
- the envisaged period for which the personal data will be stored (*or the criteria used to determine that period*)
- where the personal data was not collected directly from the individual, any available information as to its source

5. How To Make a Subject Access Request (SAR)?

A subject access request (SAR) is a request for access to the personal information that St Pauls Advice Centre holds about an individual, which we are required to provide under the UK GDPR (*unless an exemption applies*).

A Subject Access Request is valid if it is submitted by any means, and we will comply with any requests we receive in a letter, a standard email or verbally. However, we always request the Subject Access Request Form (SAR) is completed to help us ascertain exactly what information is required (See Appendix 1).

We will offer support in completing the SAR Form where appropriate.

6. What We Do When We Receive an Access Request

a. Identity Verification

Subject Access Requests (SAR) are passed to the Data Officer as soon as received and a record of the request is made on the Subject Access Request Register.

St Pauls Advice Centre will use all reasonable measures to verify the identity of the individual making the access request, especially where the request is made using online services.

If a third party, relative or representative is requesting the information on the Data Subjects behalf, we will verify their authority to act, and may contact the Data Subject to confirm their identity and gain authorisation prior to actioning the any request.

b. Clarifying the Request

If a request is unclear or covers a large amount of information, the Data Officer may contact the individual to clarify the scope of the request.

Individuals are not required to narrow or amend their request. However, clarification may help the organisation identify and provide the requested information more efficiently. Where clarification is sought, reasonable efforts will continue to locate information while awaiting a response.

c. Information Gathering

If enough information has been provided in the request to collate the personal information held about, St Pauls Advice Centre will gather all information and ensure that it is provided in an acceptable format. If we do not have enough information to locate the records, we may contact the Data Subject for further details. This will be done as soon as possible and within the timeframes set out below.

d. Information Review and Redaction

Before any information is disclosed, the Data Officer will review the records identified to determine whether:

- the information relates to the individual making the request;
- any information relating to another identifiable individual requires redaction;
- any legal or regulatory exemptions apply;
- legal professional privilege applies;
- safeguarding concerns affect disclosure; or
- any other lawful reason exists to withhold part of the information.

Each request will be considered on its own merits and only the minimum information necessary will be withheld.

e. Decision Stage

Following review of the information, the Data Officer will determine whether the request should be:

Granted in full

Where no exemptions apply, the requested information will be disclosed.

Granted in part

Where some information can be disclosed but other information must be withheld or redacted, only the relevant information will be removed. Reasons for withholding information will be recorded.

Examples include information withheld because of:

- third-party confidentiality;
- legal professional privilege;
- safeguarding considerations;
- statutory exemptions;
- ongoing investigations; or
- other lawful restrictions on disclosure.

The reasons for withholding or redacting information will be documented and explained to the individual where appropriate.

Refused

Where legislation permits the organisation to refuse the request, the reasons will be recorded and explained to the individual.

f. Information Provision

Once we have collated all the requested information, we will send this to the Data Subject, or their representative, in writing (*or in a commonly used electronic form if requested*). The information will be in a concise, transparent, intelligible and easily accessible format, using clear and plain language.

We will only provide information that relates to the Data Subject. We may be required to redact any information held about third parties, or to which a claim to legal professional privilege could be maintained in legal proceedings.

We will normally provide information electronically unless the individual requests an alternative format or another format is more appropriate.

7. Fees and Timeframes

We aim to complete all access requests within one calendar month and provide the information free of charge. Where the request is made by electronic means, we provide the information in a commonly used electronic format, unless an alternative format is requested.

Whilst we provide the information requested without a fee, further copies requested by the individual may incur a charge to cover our administrative costs.

We always aim to provide the requested information at the earliest convenience, but at a maximum, one calendar month from the date the request is received.

However, where the retrieval or provision of information is particularly complex or is subject to a valid delay, the period may be extended by up to two further months. If this is the case, we will inform the Data Subject within one calendar month and keep them informed of the delay and provide reasons.

8. Exemptions and Refusals

The UK GDPR contains certain exemptions from the provision of personal information. If one or more of these exemptions applies to the subject access request or where the organisation does not act upon the request, St Pauls Advice Centre shall inform the Data Subject at the earliest convenience, or at the latest, within one month of receipt of the request.

St Pauls Advice Centre can refuse to comply with a subject access request if it is manifestly unfounded or excessive, taking into account whether the request is repetitive in nature.

If St Pauls Advice Centre considers that a request is manifestly unfounded or excessive we may request a "reasonable fee" to deal with the request; or refuse to deal with the request.

In either case St Pauls Advice Centre will justify the decision in writing within the above timeframes.

The reasonable fee will be based on the administrative costs of complying with the request. If we intend to charge a fee we will contact the individual promptly and inform them. In these circumstances, St Pauls Advice Centre may not comply with the request until we have received the fee.

Where possible, we will give the reasons for not acting and provide details for lodging a complaint with the Supervisory Authority.

9. Learning and Continuous Improvement

Subject Access Requests provide an opportunity to review the organisation's information governance arrangements.

The Data Officer will periodically review completed requests to identify:

- recurring issues;
- improvements to records management;
- staff training needs;
- policy improvements; and
- wider information governance risks.

Learning will be used to strengthen organisational practice and improve compliance.

10. Other Rights

Right to Rectification

Under the UK GDPR, Data Subjects have the right to request rectification of any inaccurate data held by St Pauls Advice Centre. Where we are notified of inaccurate data, and agree that the data is incorrect, we will amend the details immediately and make a note of the change and reason(s).

If for any reason, we are unable to act in response to a request for rectification and/or data completion, we will always provide a written explanation and inform the data subjects of their right to complain to the Supervisory Authority.

Right to Data Erasure/Restricting Processing

In certain circumstances, Data Subjects may also have the right to request from St Pauls Advice Centre, the erasure of personal data or to restrict the processing of personal data where it concerns personal information; as well as the right to object to such processing. See St Pauls Advice Centre's Data Retention and Erasure Policy and Procedure for further information.

11. Submission

SAR's should be sent by post to The Data Officer, St Pauls Advice Centre, 1st Floor, Junction 3 Library, Baptist Mills Court, Bristol, BS5 0FT, by email with Subject Data Access Request in the title to rob@stpaulsadvise.org.uk or by telephoning 0117 9552981.

12. Lodging a Complaint

Complaints should be made to the CEO in writing at: St Pauls Advice Centre, 1st Floor, Junction 3 Library, Baptist Mills Court, Bristol, BS5 0FT. See St Pauls Advice Centre Complaints Policy and Procedure for further information.

13. Supervisory Authority

Data Subjects have the right to lodge a complaint with the Supervisory Authority. The Information Commissioner's Office (ICO) can be contacted at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Telephone: 0303 123 1113 (*local rate*) or 01625 545 745 (*national rate*)

Email: enquiries@ico.org.uk

Document Control	
Date of Last Review:	July 2026
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Review Cycle:	Annual
Changes from previous versions:	Comprehensive review and redraft. Updated for UK GDPR, the Data Protection Act 2018 and the Data (Use and Access) Act 2025. Rewritten in plain English, strengthened governance and accountability, modernised the process for receiving, verifying, reviewing and responding to Subject Access Requests, clarified statutory timescales, exemptions and decision-making, improved record-keeping and audit arrangements, updated the Subject Access Request Form and procedure, and aligned the document with current ICO guidance, the organisation's wider Information Governance framework and best practice.

Subject Access Request Procedure

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Data Subject asked to complete Data Subject Access Request Form



The Data Officer verifies identity of applicant or authority from the Data Subject where the request has come from a 3rd party



Clarification sought, where necessary, about exact information required



Subject Access Request logged on Subject Access Request Register



Information gathered and any information about 3rd parties redacted



Information provided to the Data Subject within 30 days. If not possible, the Data Subject must be informed of the reason for the delay within 30 days. Information must be provided with a further 2 months.



All information must be provided free of charge, unless requests are manifestly unfounded or excessive.

Subject Access Request Form

Under the General Data Protection Regulation, you are entitled as a data subject to obtain from the organisation, confirmation as to whether we are processing personal data concerning you, as well as to request details about the purposes, categories and disclosure of such data.

You can use this form to request information about, and access to any personal data we hold about you. Details on where to return the completed form can be found at the end of the document.

1. Personal Details:

Data Subject's Name:		DOB:	___ / ___ / ___
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Home Telephone No:		Email:	
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Data Subject's Address:

Any other information that may help us to locate your personal data:

2. Specific Details of the Information Requested:

3. Representatives *(only complete if you are acting as the representative for a data subject)*

[Please Note: We may still need to contact the data subject where proof of authorisation or identity are required]

Representative's Name:		Relationship to Data Subject:	
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Telephone No:		Email:	
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Representative's Address:

I confirm that I am the authorised representative of the named data subject:

Representative's Name: _____ Signature: _____

4. Confirmation

Data Subject's Name: _____ [print name]

Signature: _____ Date: ___ / ___ / ___

5. Completed Forms

For postal requests, please return this form to:

The Data Officer, St Pauls Advice Centre, 1st Floor, Junction 3 Library, Baptist Mills Court, Bristol, BS5 0FT

For email requests, please return this form to The Data Officer:

rob@stpaulsAdvice.org.uk with Data Subject Access Request in the title.