

How to Comply with a Subject Access Request

Complying with a Subject Access Request

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This guidance note has been prepared to assist you to understand and comply with a Subject Access Request.
As such, the advice given is general, and should not be interpreted as a definitive guide.

Your Legal Responsibility

What is a Subject Access Request?

This is a request from a *person* asking an *organisation* to provide them with the information relating to that *person* which is held or processed by the *organisation*.

What law gives this right and governs how we respond to such a request?

Section 5 of the Data Protection Act 2002 ('the Act') gives individuals the legal right to request copies of the *information* held about them, together with a description of the purposes for which *information* is, or has been, processed and to whom the *information* can be, or has been, disclosed. This is not a right to documents and you are not required to provide copies of actual documents. In practical terms it is often easier to copy a document, but alternatively you may, if you wish, provide the individual with a summary of the *information*.

It is your legal obligation to comply with a Subject Access Request in accordance with the Act.

Failure to comply could result in compensation being sought by the person, together with a fine of up to £5000

What jargon should I understand?

In order to respond to a SAR it is important that the terms used within the law are understood.

A glossary containing the words frequently used appears on the next page.

We have where possible used commonly-used words to replace legal terms to assist in the comprehension of this advice. These words will appear in *italics* within this document and appear in **red** in the glossary.

Glossary

Data	Information which — (a) is being processed by means of equipment operating automatically in response to instructions given for that purpose. This includes, among others, computers, laptops, palm tops, CCTV, phone systems, entry logging systems. (b) is recorded with the intention that it should be processed by means of such equipment, (c) is recorded as part of a relevant filing system or with the intention that it should form part of a relevant filing system, or (d) does not fall within paragraph (a), (b) or (c) but forms part of an accessible record.
Data Subject <i>Person</i>	An individual who is the subject of personal data.
Personal Data <i>Information</i>	Information that relates to a living individual which, on its own, or when combined with other information in the possession of, or likely to come into the possession of, the data controller, identifies that individual. This also includes any expression of opinion or intentions of the data controller toward the data subject.
Data Controller <i>Organisation</i>	The person or legal entity (e.g. company, government department etc) which is responsible for deciding what information is collected, how it is used and to whom it is released.
Processing	This includes the collection, input, storing, retrieval, amendment, disclosure, blocking, combination and erasure or destruction of data. Also data capture which involves the transfer of details from a manually completed form to a database or other computerised system.
Relevant Filing System	A set of information relating to individuals that is not processed automatically (i.e. manual records) but which is structured to enable the ready accessibility of the data. This means that, for example, a Human Resource filing system which has individually named files with sub-divisions for sickness, assessments, c.v. information etc.
Accessible Record	Health or educational record, any housing record kept by Department of Local Government and Environment, local authority or joint board, and certain other DHSS records.

What will a Subject Access Request look like?

The law simply states that the request must be made '**in writing**' which includes a request received by email. There is **no standard format** for this request and it does not need to mention the Data Protection Act. A request may be worded in different ways, and could be as simple as 'Please provide me with copies of all the information you hold about me.'

It is important that you and your staff are able to recognise when a Subject Access Request (SAR) is being made.

A sample Subject Access Request Form can be found in Appendix 6 of this guide.

Who can make a SAR?

A request is normally made by the *person* to whom the *information* relates.

A parent, or guardian, who has joint, or sole, parental responsibility can make a request on behalf of their child, though this is dependent upon the age and maturity of the child.

A third party acting on behalf of the person may also make a request.

If the request is made by any party other than the *person*, evidence is needed to prove they are authorised to request, and receive, this *information*. This may be a letter from the person, for example, but it would be best practice to confirm this with the person whose information has been requested prior to commencing the SAR.

In the case of an Advocate or a MHK, a letter naming the individual and stating that they are acting on behalf of that individual can be accepted. However, if you feel uncertain about disclosing information, checks should be made.

When do I have to do reply to the SAR?

You should acknowledge receipt of the request in a letter **immediately**.

To comply with the law you must provide the *information* requested **promptly** and in any event within **40 calendar days**. (See the Action Summary in Appendix 5)

What details can a *person* request?

A person can request copies of computerised records, opinions about them, intentions of the *organisation* regarding them and also any details held in a relevant filing system.

Can I charge them for this request and, if so, how much?

Yes, you may charge a fee up to the maximum of £10 per request, or up to £50 for health records. No additional fees can be levied in respect of administration or copying costs etc.

If you charge a fee, you should obtain this before commencing the SAR.

The Practicalities

What do I need from the person making the request?

Firstly you need to be able to satisfy yourself of their identity, or the identity of a third party making the request. **REMEMBER - information obtained through a SAR can be used for identity theft.**

Where possible you should have any reference numbers or identifiers, e.g. account number or staff number specific to your *organisation*, which can identify the person accurately. This should be in addition to the basic requirements of full name, address (and previous address if the SAR covers a long period of time) and, where necessary, date of birth.

I need more details/ they have not enclosed the fee – what now?

In either case, you will need to send a letter or telephone the person requesting the additional details you **reasonably** require, or requesting the fee.

However, if you require a fee or further information this should be requested promptly. Any delay in seeking this reduces the time you have left to comply with the request when the fee or further information is returned.

For example, you receive a SAR on Day 1 and request a fee on Day 2 – the time stops on Day 2 and you will have 38 days left to comply with the request from the day you receive the fee. If you receive a SAR on Day 1 but do not request the fee until Day 8 you will only have 30 days left to comply with the request from the day you receive the fee.

But I only have 40 days to respond – what if they take a long time to reply?

You are not obliged to comply with the SAR until you are in receipt of the fee, if charged, and you have been provided with any further details that you have reasonably requested.

The request does not make it clear exactly which details they require?

The SAR may be for everything you hold about them, or it may be for one specific period of time, event or type of data.

If you are in any doubt as to what details the person requires, it is best to speak with them to clarify the matter. This will make sure **you** are looking for the right data and **they** are going to receive what they really want.

Simply checking with the person may save you a lot of time and effort, and you will also be able to respond more quickly to the request.

They have already made a SAR – do I have to do it again?

No - not necessarily.

If an identical or similar request has been complied with recently and the *information* is amended infrequently then you will not be obliged to undertake a new search. This will depend however on how often the *information* is amended e.g. bank statements etc will generally be amended far more frequently than dental records.

There is a lot of data about them – do I have to copy it all?

If there is a lot of data about the person, you may be able to claim an exemption from complying with the SAR due to 'disproportionate effort'. However the Data Protection Supervisor is unlikely to consider that a search of computerised records, documents or emails, even where this includes large numbers of items, as being a "disproportionate effort".

In practice, claiming “disproportionate effort” as a basis for refusing to comply with a SAR is highly unlikely to satisfy the person requesting their details and such requests should be viewed on a ‘case by case’ basis.

This can often be resolved by simply contacting the person who has made the request and check whether they really do want ALL the data.

If so and it is mutually agreeable, it could be easier and quicker for them to come and see the data ‘in situ’ if there is a large amount to see.

What if the *information* is difficult to copy?

Certain types of *information* are difficult, or very expensive, to copy e.g. x-rays, microfiche or CCTV images. Again, it would be good practice to ask the person if they would like to see them in situ. Once viewed the person may be satisfied that the SAR has been completed or may request copies of specified items rather than everything.

Is there any *information* I cannot release?

Yes there are certain cases when *information* does not need to be released. These are called **exemptions**, but are not ‘bans’ to providing individuals with their information.

These exemptions include, but are not limited to:

- the detection and prevention of crime and the apprehension and prosecution of offenders;
- the discharge of a regulatory activity;
- in the interests of national security;
- *information* relating to adoption, physical or mental health references within education or health records, where revealing this *information* could cause serious damage or harm to the mental or physical health of the *person* or any other person;
- *information* relating to health records can only be disclosed if the *organisation* is a health professional or the *organisation* has consulted with the health professional as to whether this data can be released, or if the *organisation* is aware that the *person* already has knowledge of the details contained in the health record;
- where legal professional privilege can be claimed.
- confidential references given, BUT NOT confidential references received

If you require more information on the disclosure exemptions, please contact the Office of the Data Protection Supervisor. (‘Where can I get help?’ Page 12)

How do I start looking for the *information* requested?

Use the identifying details provided by the person to start the search. These should provide you with sufficient details to enable you to search computer files and manual files for the *information* you require.

Searches should be made of all relevant email servers, computer drives, databases and manual systems. You can consider using the name, account number or other identifier as the search parameter in the body of documents, or in the subject line or body of emails. If the person making the request is an employee, or ex-employee, staff circulars or newsletters, and emails sent and received in the course of their employment are unlikely to be personal data and may be excluded from the search.

*You should take care when searching that the details **do** relate to the person who made the request. For example, there may be two people with the same forename and surname, but a different date of birth.*

How do I know which *information* to release?

This is usually the most difficult part of complying with a SAR.

Please see the series of questions on the following pages that assist you in working through the process of identification.

How to determine which information to disclose

The following questions are intended to assist you in determining which information should be disclosed when a subject access request is made under section 5 of the Data Protection Act 2002.

1. Is it DATA as defined in the Act?

- a. Is it processed by automatic means?
e.g. on computer, laptop, palmtop, mobile phone with email capability, CCTV, access control system?
- b. Is it part of a structured manual filing system?
i.e. can it be readily accessed in the file? Is the file subdivided to ensure ease of access or is it simply in date order with all types of information in one run?
- c. Does it form part of an accessible record?
e.g. is it a health, education, social services or local authority record?

If you answer **YES** to one of these three questions then it is data. **Continue on to Question 2**

If you answer **NO** to **all** these questions then it is not data and the requirements and rights of Act do not apply.

2. Is it PERSONAL DATA?

This is information which identifies a LIVING INDIVIDUAL either on its own or in combination with other information in, or likely to come into, your possession.

The Act does not apply to deceased persons, or to companies. If however a 'company' consists of a sole trader or is a partnership, then they will be deemed to be an 'individual' for the purposes of the Act and the right of subject access will apply.

Personal data includes opinions regarding the person and intentions of an employer regarding an employee.

For more comprehensive guidance on what is 'personal data' see our advice note "Is it personal data?"

If it is **not** personal data, the requirements and rights of the Act do not apply.

If it is PERSONAL DATA then go to Question 3

3. Does the information contain any third party details?

A third party (TP) is a person other than the individual making the request.

The word 'disclosing' in this respect means releasing details of the third party not already known to the person.

If this TP is acting in a **professional capacity**, e.g. a doctor who has given an opinion or an advocate etc and the information contains their professional advice or opinion, their identity does not need to be removed.

There are certain specific Orders relating to subject access requests involving Health, Education and Social Work records. If you require specific advice on these Orders, please contact the Office of the Data Protection Supervisor.

If the TP is not acting in a professional capacity, the release (disclosure) of the *information* will need to be assessed on a 'case by case' basis - there are no hard and fast rules.

When deciding to release or not to release *information*, the *organisation* should take into account the information contained in Appendix 1




Go to Question 4

4. Is the personal data subject to legal professional privilege?

Legal professional privilege can be applied in two areas. Firstly it attaches to any document which was created with the dominant purpose of being used in current or potential litigation. Secondly this privilege attaches to any document created by third parties as part of the process of giving or receiving legal advice.

If personal data consists of information in respect of which a claim to legal professional privilege could be attached, the personal data **shall not be disclosed unless that privilege is waived**.

Information an advocate receives in the course of advising his client is **confidential** and **should usually only be disclosed with the client's authority**.



Go to Question 5

5. Are there any exemptions to disclosure that apply?

Once these questions have been addressed, there still remain several exemptions which may apply to certain types of information.

These include

- ongoing negotiations between the individual and the organisation, where revealing the intentions of the organisation would prejudice the negotiations. When these negotiations have been completed, these details will be subject to a SAR in the normal way.
- information held as part of health, education or social services records. This must be determined, however, on a case by case basis, as the exemption only applies if disclosure is likely to cause severe distress or harm to the physical or mental health or condition of the person making the request or to any other person.
- information processed in respect of the prevention and detection of crime and the apprehension and prosecution of offenders, where disclosure could prejudice a judicial process or in the interests of national security.
- information which has been provided in response to an enquiry undertaken by a regulatory body or authority. To ensure that regulatory activity can be undertaken, regulatory bodies need to be able to rely on full and frank exchanges without the concern of details of such discussions being released. Without the ability to withhold disclosure in such cases, the ability of a regulator to make sound, informed decisions with the full co-operation of other parties in the enquiry will be negated.
- a confidential reference given - a reference that has been received however should be disclosed. A reference should be truthful, should not contain anything that is factually incorrect or inaccurate, in which case what would prevent you from disclosing the reference even though an exemption from disclosure may be claimed?

Where these exemptions may reasonably be applied, then disclosure of that information is not necessary.

If you are unsure whether any of these exemptions may be applied, you may seek further assistance from the Office of the Data Protection Supervisor.

6. I have collected all the *information*, what do I do now?

Check:

- Is it all personal data?
- Does it all relate specifically to the person?
- Are there any references to third parties that should be withheld?
- Are the files marked to show this data has been supplied under a SAR?
- Is there a copy of the details in case they get lost in transit, or are queried?
- If there is a copy, where, and for how long, should it be kept?
- Has the person been advised that the SAR has been completed?

Send:

- The *information* you have copied together with a letter concluding the SAR.

However if you found no *information*, you must still communicate this outcome to the person by letter.

Sample letters can be found in Appendix 2

Where can I get help?

Most businesses will have a Data Protection Officer, or Co-ordinator. They are most likely to be the person that deals with SARs and to whom you can refer queries. If not you could refer it to your line manager.

If, having done so, there are still concerns, you can contact the Data Protection Supervisor for assistance.

Further advice may be obtained by contacting

The Office of the Data Protection Supervisor
By post: PO Box 69 Douglas IM99 1EQ
By visiting: Willow House, Main Road, Onchan
By telephone: 01624 693260
By email: enquiries@odps.gov.im
Website: www.gov.im/odps

Appendix 1 – Third Party Details

A third party (TP) is another individual other than the individual making the request.

The word 'disclosing' in this respect means releasing details of the **identity** of a third party not already known to the person.

It is at this point that the data protection officer must 'pretend' to be the *person* who has made the request. Every page of information that has been produced as a result of the search has to be read through as if you were the person who made the request.

If the identity of the third party is already known to the person, then the data relating to that TP can be revealed to the person, because he already knows it.

If the identity of the third party is not known to the person in the context revealed by the document then the data protection officer will need to consider the following:

- will blanking out the name of the individual, or other identifying particulars disguise the identity of the TP from the person making the request?

If so, following the blanking out of this information the remainder of the document may be included in the information supplied to satisfy the subject access request.

If blanking out will not disguise the identity of the TP then the data protection officer will need to consider the next stage of obtaining consent from the TP concerned to disclose this information which would reveal his/her identity.

Has the TP already given their consent allowing the disclosure?

Can you obtain the consent of the TP to release their name within the time frame of the SAR?

How much *information* can be given without disclosing the identity of the TP?

Can the *information* identifying the TP be edited (blacked out etc) in such a way as to allow the details of the *information* to be disclosed without revealing the TP?

Where consent has not been obtained, information regarding third parties should be removed as far as possible - but take care, details such as appointment or meeting times mentioned in correspondence, for example, could identify the third party on their own, even if the actual name of the third party has been removed from the correspondence.

Is it reasonable to disclose TP details without consent?

E.g. the name of a bank manager, who has had previous meetings with the person and is, therefore, known to the person. Even if the details of this TP were edited, the person would still be able to recognise who it referred to anyway, so is it really necessary in this sort of case to seek consent or try to edit the name?

Where consent has been refused, the disclosure can still be made if it is reasonable in all circumstances to do so.

For example, a bad reference given by a former employer proves to be the deciding factor in an applicant not being offered a post and the applicant is informed as such. The applicant requests a copy of the reference from the company. The former employer refuses to give consent to the company to disclose the information. However, individuals have the right to have any inaccurate or incorrect data about themselves amended, corrected, erased or destroyed. So in this circumstance it would be reasonable to disclose the reference without the consent of the former employer so that the person could review the information contained within the reference for any inaccuracies which may have had an effect on their job prospects.

It is important to note here however that a reference received can be disclosed but an exemption exists for references given.

Will disclosure of the *information* cause harm to the TP?

If you think that revealing TP details could cause them **harm**, then it is **not reasonable** to release this *information* **without consent**.

Is there a duty of confidentiality owed to the TP?

Where a **duty of confidentiality** exists it is **not reasonable** to release the TP *information* **without consent**.

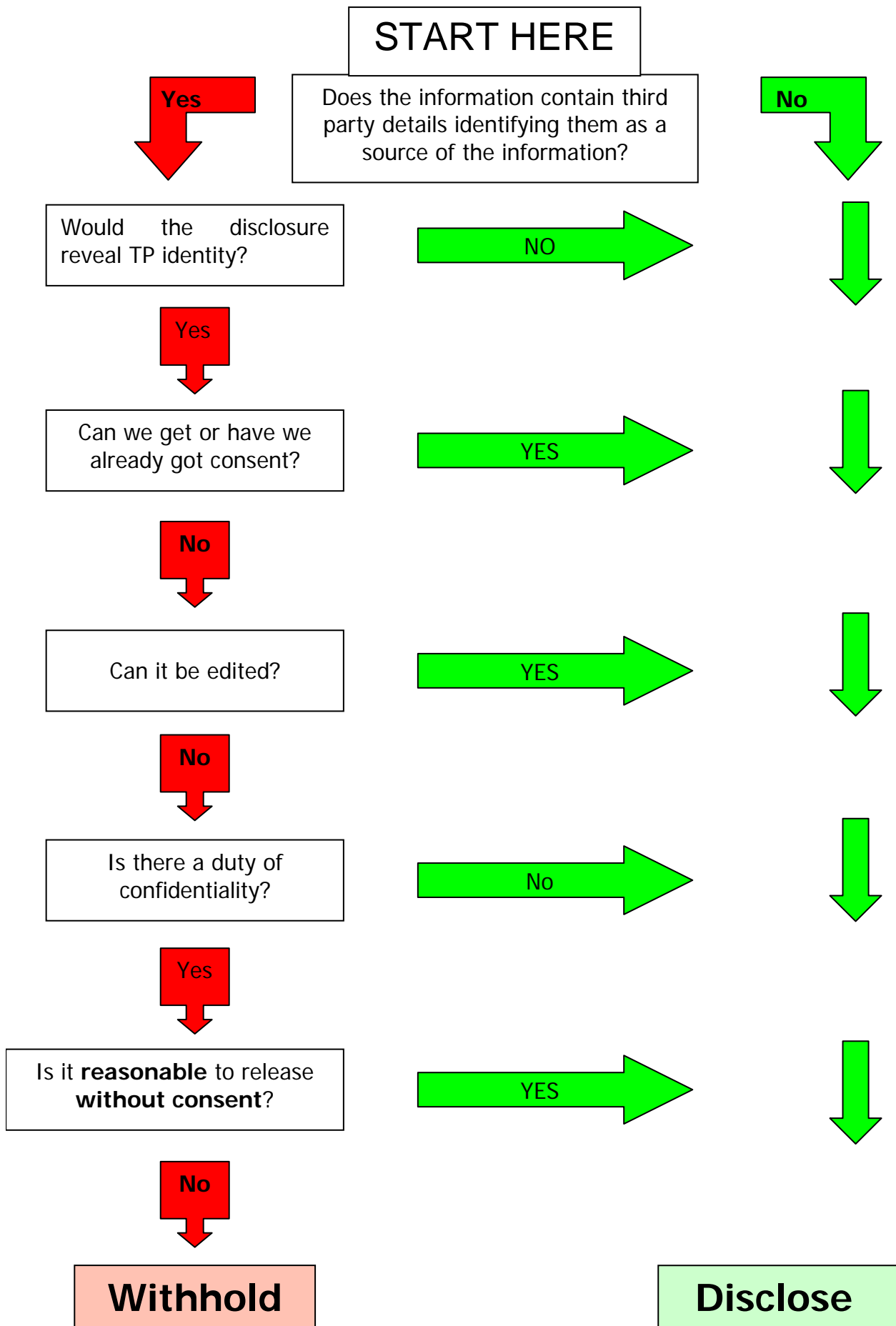
However, just because a letter states 'In Confidence' this does not necessarily impose a duty of confidentiality; this is an expression of an expectation of confidentiality.

Depending on the circumstances, even though a duty of confidentiality exists, you may still need to provide the person with a summary of the information.

IF YOU ARE IN ANY DOUBT AS TO WHETHER THIRD PARTY NAMES SHOULD BE DISCLOSED, ERR ON THE SIDE OF CAUTION AND WITHHOLD THE NAMES OR INFORMATION, SUCH AS PLACE AND TIME OF MEETING WHICH COULD IDENTIFY THE THIRD PARTY.

The flow chart on the following page should help identify which third party details may be disclosed.

Third Party Details Disclosure Flow Chart



Appendix 2 - Sample Letters

Reference SAR/XXXX/200X

Dear

Subject Access Request

Further to your letter of xxxxxx I enclose copies of the information which <company name> holds relating to your request under the Data Protection Act 2002 which we are required to supply in compliance with that Act.

OR

Further to your letter of xxxxxx we have found no information which <company name> holds relating to your request under the Data Protection Act 2002 which we are required to supply in compliance with that Act.

Appendix 3 - Good Practice Recommendations

- Respond by letter to the person as soon as you receive the SAR either advising that the request is being undertaken or to request further details or fee, if charged.
- Communicate with the person to assist you in identifying the information they actually want.
- Comply as quickly as possible; do not use the maximum time allowed as your target date for completion.
- Ensure that you maintain an audit trail; keep a record of dates for commencement, completion, details of correspondence sent and received, thought processes and reasons for non-disclosure etc.
- Mark the files that you copy to denote that a SAR has been complied with.
- Maintain a separate file for SARs received by the *organisation*; this should contain the correspondence, a copy of the information sent and the audit trail documenting the handling of the request.

It is important to maintain a file solely for Subject Access Requests. If you fail to respond to a SAR within the permitted time the person can request the Office of the Data Protection Supervisor to undertake, on their behalf, an assessment of the data which is held by the organisation (See FAQs). If this occurs, it will initially be the information held in this file which will be required at the outset of the assessment.

Appendix 4 - Frequently Asked Questions

A police officer showed his warrant card and asked me to give him details of the records we hold for a member of staff?

If you are requested to provide *information* in relation to the prevention or detection of crime or the apprehension or prosecution of offenders, the discharge of a statutory function or the assessment or collection of any tax or duty by the police, or *any other authorised official or body*, you should ask them to provide you with a **Section 25 Indemnity Form**.

They should be aware that this is required before information can be given to them.

An MHK has requested that I send him contact details of all our customers in his constituency?

The Act applies equally to an MHK as it does to any other person, therefore they should be treated in the same way. There is no requirement to provide the *information* requested unless they have a right to obtain and/or use that *information*. They only receive special privileges in relation to Tynwald.

I only process data for the three core business purposes and am exempt from the notification requirement; do I have to respond to a SAR?

Yes - even if you are exempt from notification, you still have to comply with the Act and its provisions.

How much can I charge?

Up to a maximum of £10, or up to £50 in the case of health records.

Can I refuse to respond?

No – it is a legal obligation. It is subject, however, to certain disclosure exemptions.

How long have I got to respond?

You should respond as promptly as possible and in any case within 40 calendar days

When does the 40 day response time commence?

The time starts on day on which you receive the request.

If further *reasonable* requests have been made for details to aid your search, or you have requested a fee, the time commences the day you receive these from the person. However you cannot delay making a request for further information and/or fee in the mistaken belief that you can extend the time for response to a SAR - if it takes you 10 days to make the request for additional information, you will have 10 days less to complete the SAR. The clock starts ticking the day the SAR is received and cannot be stopped until you have either sent the request for the fee or additional information, or you have completed the response.

What if I don't respond within the 40 days?

You will be in breach of the Sixth Data Protection Principle. The person can then request the Data Protection Supervisor to undertake an **assessment** of the information you hold about them on their behalf. **The person can also seek compensation for distress and the Court could additionally fine you up to £5000.**

Does this assessment have to happen?

Yes – if the Supervisor receives a request for assessment, the law states that the Supervisor 'shall' undertake an assessment. This is normally done through correspondence and usually a subsequent, mutually arranged meeting at the business premises.

At this meeting the Supervisor will decide which information comes under the right of subject access and advise you to disclose these details if you have not already done so.

If no response is received to the correspondence or a meeting is not possible, or the company objects, then a formal Information Notice will be served, or the powers of entry and inspection, as conferred by the Act, can be utilised to gain access to the records within the premises.

And if I still don't give the information out?

Failure to comply with the advice of the Supervisor or with an Information Notice can lead to further action being taken. An Enforcement Notice may be issued legally requiring you to comply with the SAR.

What happens if I still don't comply with the Notices?

Failure to comply with either Notice is a criminal offence and can result in the matter being referred to the High Court who can fine the business up to £5000.

I have already complied with a SAR; do I have to do it again?

Not necessarily. If this SAR is for the same or similar *information*, it will depend on the type of *information* requested and the frequency with which it changes or is amended.

There are some comments on the file about the person; do I have to include these?

Yes – the law specifically states that opinions are personal data. You may not omit details just because they are unpleasant or defamatory; you are not permitted to sanitise the *information* just to make it more palatable.

If the file contains medical records what should I do?

Medical records should not be disclosed unless you (the *organisation*) are a health professional or you have consulted with the appropriate health professional to determine whether this data can be disclosed. If the appropriate health professional is of the opinion that the release of the details would cause physical or mental harm to the person or any other person, they need not be disclosed.

Appendix 5 Action Summary

Timing	Action	Description	What to document
Day 1	Receipt of SAR	Confirm identity of <i>person</i> OR	Identification details
		Confirm identity and authorisation if not data subject themselves	Identification details & copy of authorisation letter, e.g. power of attorney
		Send acknowledgement letter	Copy of Letter sent out
Day 1	Fee	Issue a receipt for fee if charged	Fee details
Day 1	Pass SAR to appropriate person	The remainder of the SAR should be dealt with by the departmental DPISO	Sequential SAR Reference number
Days 1 - 40	Search for information	This search will be dependent upon the information requested.	
Days 1 - 40	Collate information	Identify any information which is subject to a statutory exemption from disclosure. Decide whether there are any third party details which should not be disclose. Decide whether there are any other further exemptions to disclosure that can REASONABLY be applied.	Keep a copy in a separate file, ideally in a SAR file. This will be the first point of reference in the case of a complaint being made to the Office of the Data Protection Supervisor and an assessment being undertaken. The copy may also be used to compare any subsequent SAR requests, or may be useful if the information you send out gets misplaced rather than having to undertake the process again.
By Day 40 AT THE LATEST	Send information to <i>person</i> with letter	A letter must be sent advising that the SAR has been complied with, even if no information is held in respect of that SAR or no information can be disclosed because of statutory exemptions or other exemptions that may REASONABLY be applied. In the case that exemptions mean no information should be disclosed, there is no need to mention the fact that these exemptions have been applied, merely that there is no information the data controller is 'required to supply under the Act'.	Copy of letter

Appendix 6 - Sample Data Subject Access Request Form

Date of Receipt		Date of Completion		Request Number	
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Full Name of Data Subject

Title	
Forenames	
Surname	
Maiden Name (if appropriate)	

Name of Person Making Request *if not the Data Subject*

Title		
Forenames		
Surname		
If the person making the subject access request is NOT the DATA SUBJECT , complete these two boxes	Relationship to Data Subject (eg parent/advocate /legal guardian etc)	
	Evidence of authority to act on behalf of data subject (copy to be retained with the subject access request) (eg power of attorney/ letter from advocate stating their capacity)	

Telephone Contact Details

Daytime	Evening	Mobile

Correspondence Details

Full Address of Data Subject		Previous Address of Data Subject <small>(if request covers a long period of time or relates to a different address)</small>	
Post Code		Post Code	

Full Address for correspondence <i>if request NOT made by data subject</i>	
Post Code	

Other Identifiers

Date of Birth <small>(ONLY required if necessary to aid identification in the case of two or more similar names at one address)</small>	
Other Identifiers <small>(eg departmental reference number/staff number etc)</small>	

Checklist

	Task	Yes	No	Date
1	Receipt of Subject Access Request acknowledged in writing?			
2	Identity of party making the request confirmed?			
3	Fee, if requested, received? If Yes go to 5, if No go to 4			
4	If a fee is to be charged has a request for payment of the fee been made?			
5	Further information requested? If Yes, go to 6, If No go to 7			
6	Has any further information requested been received from data subject?			
7	Information collected and a copy kept in individual subject access request file?			
8	Information sent to data subject or their representative?			

	Records Kept	Tick on completion
1	Written request from data subject	
2	Confirmation of receipt of request	
3	Authority to make request (if not data subject)	
4	Identity confirmation of party	
5	Copy of information to be given to party	
6	Copy of letter sent to party with information as requested	