



THE MAZE GROUP CIC

Subject Access Request (SAR) Policy

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Policy Approval

Approved By	Board of Directors
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1. Purpose

This policy outlines how The MAZE Group CIC handles Subject Access Requests (SARs) under the UK General Data Protection Regulation (UK GDPR). It ensures that individuals can exercise their right to access personal data held about them in a timely and transparent way.

2. Scope

This policy applies to:

- All personal data processed by The MAZE Group CIC;
- All staff, volunteers, trustees, and contractors;
- Any data subject (individual) whose information is held, including clients, employees, service users, donors, or partners.

3. What is a Subject Access Request (SAR)?

A Subject Access Request is a formal request made by an individual to access:

- The personal data held about them;
- The purpose for processing the data;
- The categories of data concerned;
- Who the data has been shared with;
- How long the data will be stored;
- Their data rights (e.g. rectification, erasure, restriction).

SARs can be made in writing (letter, email) or verbally. There is no requirement to mention "Subject Access" for it to be valid.

4. Receiving a Request

All staff must:

- Recognise and report any request to access personal data immediately;
- Forward the request to the Data Protection Officer (DPO).

5. Verification of Identity

Before processing a SAR, the requester's identity must be verified:

- Ask for proof of ID (e.g. passport, driving licence) and address (e.g. utility bill);
- For sensitive data or third-party requests, further verification may be required.

6. Response Timeframes

- The CIC must respond within one calendar month of receipt of the request or confirmation of identity.
- This can be extended by up to two months for complex or multiple requests (the requester must be informed within the first month if so).

7. Exemptions and Limitations

We may lawfully refuse or withhold parts of a request where:

- Disclosure would adversely affect the rights and freedoms of others;
- The request is manifestly unfounded or excessive;
- Legal or safeguarding obligations apply;
- Data includes confidential references or legally privileged material.

If data is withheld, the requester will be informed of the reasons and their right to complain to the ICO.

8. Providing the Data

The data will be:

- Supplied in a commonly used, secure format (e.g. PDF or Word);
- Delivered electronically via secure email or encrypted cloud sharing;
- Supplied free of charge, unless the request is excessive or repetitive—then a reasonable fee may be charged.

9. Third-Party Requests

SARs on behalf of someone else (e.g. parent, solicitor, advocate) require:

- Evidence of authority (e.g. signed consent, Power of Attorney);
- Special care with data about children or adults at risk;
- Redaction of data that relates to others unless consent has been obtained.

10. Record-Keeping

A SAR Register will log:

- Date received;
- Requester's identity;
- Type of data requested;
- Response due date;
- Outcome (fulfilled, refused, extended);
- Date response sent;
- Any fees charged.

Logs must be retained for at least 3 years for audit and accountability.

11. Roles and Responsibilities

Role	Responsibility
Board of Directors	Oversight of data rights compliance
Data Protection Officer (DPO)	Manages SAR process, liaises with requester, ensures timely response
All Staff & Volunteers	Report requests immediately, assist with data retrieval if needed

12. Training and Awareness

- Staff and volunteers are trained annually on recognising and responding to SARs.
- Induction includes rights of individuals under data protection law.

13. Complaints and Appeals

If a requester is dissatisfied:

- They may raise an internal complaint via The MAZE Group CIC's Complaints Policy;
- They may escalate to the Information Commissioner's Office (ICO): <https://ico.org.uk/for-the-public/raising-concerns/>