

Checklist for dealing with Subject Access Requests (SARs)



Step	Action/Task	Completed
1	Carry out any necessary checks to confirm the identity of the person making the request.	
2	Acknowledge receipt of the SAR and give the date by which you expect to respond (i.e. a month from the date of receipt). If necessary, ask them to clarify what information they want.	
3	If the request is complex or there are numerous requests and you expect it will take more than a month to respond, then write to them as soon as possible (and at least within the first month) explaining that your response may be delayed by up to an additional two months.	
4	If the request is unfounded or excessive then, within a month of receipt of the SAR, explain this to them and advise them that you are refusing to act on the request or that you will only respond if they agree to pay the fee you suggest. Set out how they can complain to the ICO. Such situations should be exceptional.	
5	You must provide data if the search is 'reasonable and proportionate'. Extensive efforts will be required, and data cannot be excluded because it may be difficult to access.	
6	Carry out a search on all 'relevant filing systems'. That is those filing systems which are "structured", either by reference to individuals or by reference to criteria relating to individuals, in such a way that specific information relating to a particular individual is readily accessible.	
7	Review the results and remove or redact the documents to ensure that no data is given which contains: <ul style="list-style-type: none"> • Information about settlement negotiations with the employee • Management plans about the employee • Legal advice or other documents about legal proceedings concerning the employee • Confidential references that you have provided for the employee • Health records where disclosure would cause serious harm to the health of the employee or another person • Any information concerning a third-party. 	
8	Check that your response sets out what information is being processed; the reasons it is being processed and whether it will be given to any other person or organisation; contains a copy of the information comprising the data; and gives details of the source of the data.	
9	Consult the Information Commissioner's 'Subject Access Code of Practice' if necessary.	
10	If the request is made electronically then your response should be in a commonly used electronic format (unless the request specifies otherwise).	