

SUBJECT ACCESS REQUEST POLICY

Version Number	V12026
Date Applies From	20 May 2026
Policy Owner	Data Protection Officer
Next Review Date	May 2028
<i>Uncontrolled version when printed</i>	

TABLE OF CONTENTS

Subject Access Request Policy	3
1. What is this policy for?.....	3
2. What is a Subject Access Request?.....	3
3. What is Alpha's General Policy?	3
4. Third Party Requests	3
5. How can you make a Subject Access Request?	4
6. Timeframes.....	4
6.1 Extensions	5
7. Are there any circumstances where we can refuse to respond to a Subject Access Request?	5
7.1 Unfounded or Excessive Requests.....	5
7.2 Exemptions	5
7.3 Third Party Data and Redaction.....	6
8. Can we charge a fee for responding to a Subject Access Request?	6
9. Correspondence.....	6
9.1 Secure Delivery of Information.....	7
10. Roles and Responsibilities	7
11. What is there is an error in your Personal Information?	7
12. Consultation and Engagement	7
13. Making sure we do what we say	7
14. Related Alpha Policies and Procedures	8
15. Legislation and Guidance	8
16. Equality, Diversity, Inclusion and Belonging	8
17. Data Protection	8
18. Accessibility	8
19. Document Control Data	9

Subject Access Request Policy

1. What is this policy for?

This policy details Alpha's approach to subject access requests (SAR), also known as the right of access, in line with UK data protection rules.

2. What is a Subject Access Request?

Article 15 of the UK General Data Protection Regulation (GDPR) gives a person the right to be told what information is being held about them, and to receive a copy of that information upon request, unless an exemption applies.

The information that a person is entitled to is:

- Confirmation of whether or not Alpha is holding or using their information.
- A copy of their personal information.
- Other supplementary information.

A person is only entitled to their own personal data, and not to information relating to anyone else (unless they are acting in an official capacity on behalf of that person).

Before responding to a SAR, Alpha needs to be able to:

- Decide whether information held is personal data, and if so, whose personal data it is.
- Be satisfied as to the identity of the person making the request to ensure that they are entitled to it. If necessary, Alpha will request proof of identity from the person or the third party acting on behalf of the person.

3. What is Alpha's General Policy?

We are committed to complying with a person's request for information made under the GDPR and we will respond to all reasonable requests for information that are not subject to specific exemptions as set out in the GDPR or the Data Protection Act 2018 (DPA).

4. Third Party Requests

A person may also wish that a third party make a SAR on their behalf. Alpha must be satisfied that the third party making the request is authorised to act on the person's behalf. It is the responsibility of the third party to provide evidence of this entitlement to Alpha. This could be for example, a signed letter of authority, or a power of attorney.

Alpha will not accept electronically signed letters of authority as proof of authority.

If the third party is unable to provide proof of authority that they are acting on the person's behalf, Alpha will not comply with the SAR. Alpha will however respond to the third party and explain why we cannot comply with the request.

If we have reasonable grounds to believe that a person may not understand the nature of the information we are disclosing, and we are concerned about revealing excessive information to the third party, Alpha will contact the person first to make them aware of the concerns.

Alpha will assess the validity of the authority provided on a case-by-case basis and may request additional information where necessary to confirm authorisation.

5. How can you make a Subject Access Request?

A person can make a SAR verbally, or in writing, including by social media. The request can be made to any Alpha colleague. It does not have to be directed to a specific person or contact point. However, the requests will all be passed to Alpha's Data Protection Officer.

Information on how to make a SAR will be made available on Alpha's website.

If a person wishes to send a request directly to the Data Protection Officer, the following postal address should be used:

Data Protection Officer, Poppyfields Management Office, Woodpecker Close, Upton, CH49 4AA.

Where a SAR has been made electronically, Alpha will respond to the request electronically.

6. Timeframes

Alpha will respond to your SAR within one month of receipt of all the relevant information detailed above.

The time limit for a SAR from a third party will not commence until suitable evidence of proof of authority is provided to Alpha. The one-month period will commence from the date relevant evidence is received.

Similarly, if there are doubts about the identity of the person making the request, more information, including proof of identity may be requested. The period for responding to the request begins when the additional information is received.

Where the scope of a SAR is not clear and/or where additional information is requested from the person (or third party) by Alpha to clarify the scope, the one-month period for responding to the request will be frozen and will not start again until the additional information is received.

6.1 Extensions

Where a request is complex or a number of requests have been received from the person, the time limit may be extended by a further 2 months. The person will be advised within the one-month period of receiving the request if more time is needed to provide the data, along with an explanation of why the extension is necessary.

Where an extension is required, Alpha will inform the person within the initial one-month period, including:

- The reason(s) for the delay; and
- The expected timeframe for response.

7. Are there any circumstances where we can refuse to respond to a Subject Access Request?

7.1 Unfounded or Excessive Requests

We can refuse to respond to your subject access request if we believe that your request is manifestly unfounded or excessive. If we do refuse to respond to your request on this basis, we will explain to you the reasons why we will not deal with your request and provide you with information about your right to complain to the Information Commissioner's Office (ICO) about our handling of your request.

Where a request remains broad, Alpha will ask you to clarify and/or refine and/or identify more precisely the information being requested. In some cases, more information will be needed.

If the scope of the request remains very broad, it may be considered that the request is manifestly excessive or unreasonable.

Alpha will carry out reasonable and proportionate searches for personal data when responding to a Subject Access Request.

This includes searching relevant systems, records and locations where personal data is likely to be held. Alpha is not required to search every possible location where it would be unreasonable or disproportionate to do so.

7.2 Exemptions

There are certain exemptions to the right to access personal information, and further guidance on this is available on the [ICO's website](#). Examples of possible exemptions include information that is covered by legal professional privilege, information that would prejudice the prevention or detection of a crime, confidential references we have provided or information about other people.

Exemptions are considered on a case-by-case basis. If an exemption does apply, Alpha may sometimes be obliged to rely on it (for instance if complying with a SAR would break another law).

Where an exemption applies, this will be documented, along with the reason(s) for relying on the exemption.

7.3 Third Party Data and Redaction

Where information requested includes personal data relating to other individuals, Alpha will consider whether it is reasonable to disclose that information.

Where appropriate, Alpha may:

- Seek consent from the third party; or
- Redact or withhold third-party personal data to protect their rights and freedoms.

Each case will be considered individually in line with data protection legislation.

8. Can we charge a fee for responding to a Subject Access Request?

Under GDPR, we cannot charge a fee for standard SAR. However, the GDPR allows us to charge a reasonable fee where a request is unfounded or excessive. This will usually mean that the request is repetitive.

We are also entitled to charge a reasonable fee to comply with any requests you make for further copies of the same information. Any fee charged for the additional copies of information will be based on the administrative costs of providing you with the information.

If it is decided to charge a fee, Alpha will contact the person making the request to inform them of this. The request will not be complied with until receipt of the fee.

9. Correspondence

Where Alpha:

- Refuses to comply with a request
- Applies an exemption
- Requests a reasonable fee
- Requests additional information
- Extends the timeframe for dealing with a request.

This will be confirmed in writing within one month of receipt of the request to the person requesting the information, along with:

- The reason(s) why.

- Their right to make a complaint to the ICO or another supervisory authority.
- Their ability to seek to enforce this right through the courts.

9.1 Secure Delivery of Information

When responding to a SAR, Alpha will provide information in a concise, transparent, intelligible and accessible format.

Information will be disclosed securely, using appropriate methods to protect personal data, which may include encrypted electronic transfer or secure postal services.

10. Roles and Responsibilities

The Data Protection Officer:

- Is responsible for overseeing compliance with SAR requirements.
- Will review and approve responses, including any application of exemptions or redactions.

The Data Protection Officer can delegate any of their responsibilities in connection with SARs at any given time, as and when required.

Relevant teams and colleagues are responsible for conducting searches and providing requested information.

A central log of all SARs will be maintained.

11. What is there is an error in your Personal Information?

If you notice an error in the personal information we have provided to you in response to your SAR, please contact the Data Protection Officer and ask us to rectify the error. We will review your request to rectify the information. If we agree that the information is inaccurate, we will rectify the error and erase the inaccurate information if possible.

12. Consultation and Engagement

This policy has been consulted on with Alpha's Data Protection Officer and colleagues involved in dealing with subject access requests during April 2026.

13. Making sure we do what we say

This policy will be reviewed every 2 years, but sooner if needed where there has been any change in legislation or regulation, including any change in best practice.

Although there are no Key Performance Indicators (KPIs) in place, a central log of all SARs received and timescales is kept and is reported quarterly to Alpha's Audit and Risk Committee.

Alpha's Data Protection Officer is responsible for ensuring compliance with Alpha's Subject Access Request Procedure.

14. Related Alpha Policies and Procedures

You may wish to read our policies on:

- Subject Access Request Procedure
- Data Protection Policy

15. Legislation and Guidance

The following legislation and guidance have informed this policy:

- Data Protection Act 2018
- UK General Data Protection Regulation (GDPR)
- Data Use and Access Act 2025
- [Guidance from the Information Commissioner's Office](#)

16. Equality, Diversity, Inclusion and Belonging

Making sure that our policies are inclusive and ensure fair treatment for all is really important to us. We have carried out an Equality Impact Assessment on this policy to understand the impact that it may have on equality groups or individuals.

If you think we have got this wrong, please contact the policy owner.

17. Data Protection

The handling of any personal data will be dealt with in accordance with Alpha's Data Protection Policy.

18. Accessibility

If you require this policy in an alternative format, please get in touch with us.

19. Document Control Data

Author/Reviewer	Katie Blundell, Governance Business Partner Jess Williams, Data Protection Officer
Equality Impact Assessment Date	20 April 2026
Consultation/Alpha Scrutiny Panel Date	Consultation was undertaken with relevant colleagues as set out in the policy.
Approved by SLT	May 2026
Committee Approval Date:	ARC 06/05/2026
Board Approval Date	19/05/2026

