



SUBJECT ACCESS REQUEST POLICY

REVIEW DATE: APRIL 2026



Introduction

1. Data Protection legislation provides a right of access to individuals in respect of personal data of which they are the subject, this is referred to as a Subject Access Requests (SAR). The purpose of this Policy is to ensure that Community Gateway Association (CGA) responds to SARs fairly, transparently and in accordance with legislation and statutory timescales.
2. Every SAR received by CGA will be treated equitably without prejudice or discrimination.
3. This Policy applies to all companies within the CGA Group.

Receipt of Requests

4. In accordance with legislation and the Information Commissioners' guidance, CGA will only respond to requests where they are specific in the information they request and provide adequate information to be able to locate the data requested.
5. CGA will accept SAR's via any method including: letters, email, through our social media channels or verbally to any CGA colleague.
6. CGA reserves the right to request identification documents to ensure the identity of an individual making a request can be verified. If CGA makes such a request for identification the timescale for responding to the request will not start until CGA has received the documentation and has been able to verify the individual's identity.

7. If a representative submits a SAR on behalf of an individual, before processing the SAR, CGA will require written and signed proof that the individual has given consent for the representative to make the request on their behalf.
8. CGA will acknowledge receipt of a SAR to the individual or their representative in writing within two days of receiving the request.
9. CGA will always aim to comply with SAR within the statutory one-month timescale. However, CGA may extend the timescale for responding to a request by up to a further two months if the request is complex or the individual has submitted several simultaneous requests. Should CGA decide to extend the timescale for responding, the individual will be informed in writing within one month of receipt of the request and an explanation of why an extension has been applied will be given.
10. If a request is ambiguous and it is difficult to determine what information is being requested, CGA may reasonably require the individual to provide further information to help clarify the request. CGA is not obliged to comply with the request until further information has been provided and the time limit for responding to the request will be paused until clarification has been received. If CGA does not receive a response to the request for clarification within a reasonable period of time (normally one calendar month) the request will be considered as closed.
11. If repeated, similar or identical requests are made by the same individual, CGA may decide not to comply with the request until a reasonable interval of time has passed since the last request was made. If a decision is made not to comply with a request for this reason, the individual or their representative will be informed and advised of their right to complain to the Information Commissioners Office.

Responding to Requests

12. Wherever possible, CGA will provide the response to a request in the format preferred by the individual, provided that this will not compromise the security of their personal data. When providing a response electronically, CGA will ensure that the information is provided in a commonly used electronic format. In accordance with our Accessible Communications Procedure, CGA will make reasonable adjustments to supply information in alternative formats to meet individual's communication needs, this may include the provision of information in braille or alternative languages.
13. When responding to a request, CGA will follow prescribed standards to ensure that third party information is not disclosed.
14. CGA may decide to refuse all or part of a request if the data falls under one or more of the exemptions contained within relevant legislation.
15. When responding to a SAR, CGA will also provide the individual with the following information in relation to the data which is being disclosed:
 - details of the legal grounds for processing their personal data; and
 - the retention period which applies to the personal data.
 - the individuals right to complain to the Information Commissioner's Office if they believe CGA has not fully complied with their subject access request.
16. CGA will not routinely charge a fee for a SAR but reserves the right to do so if the request is considered manifestly unfounded or excessive. This can include repetitive requests for the same information. Any fee which is charged will be reasonable and calculated taking into account the estimated staff time and administrative costs of providing the information. Should CGA decide to apply a charge for a SAR, the individual who has submitted the request will be notified

at the earliest opportunity following receipt of the request. CGA will not comply with the request until the fee has been paid by the individual.

Requests for information relating to children

17. CGA will consider guidance issued by the Information Commissioner's Office when dealing with requests for information in relation to children. This will include consideration of whether the child is mature enough to understand their rights under data protection legislation.

Responsibilities

18. The responsibilities of individuals and teams in relation to this Policy are summarised below:

Risk and Assurance Co-ordinator

- Responsible for overseeing the response to a Subject Access Request including acknowledgement, logging the request, gathering relevant data from teams, reviewing and redacting the data, and providing the final response to the individual.

Head of Business Assurance

- Responsible for supporting the Risk and Assurance Co-ordinator in fulfilling their responsibilities.
- Responsible for determining whether CGA will charge a fee for a SAR, applying any exemptions to the individual's data, reviewing the SAR data prior to release, compiling the covering response to the SAR, and ensuring overall compliance with data protection legislation.

Heads of Service and Individual Teams

- Collating all information relevant to the individual's request within their area of the business and obtaining any information from third party data processors that is relevant to the individual's request.

Monitoring and Reviewing

19. This policy will be reviewed every two years or following any changes to relevant legislation or guidance issued by the Information Commissioner's Office.

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