

Subject Access Request Procedure

Pocket Money Adventures CIC | Version 1.1

Effective: 2 October 2026 | Review: 2 October 2027 or sooner on relevant change

Policy owner: Nathan Waldron, Director | Signatories: Nathan Waldron and Bernadette Houlton | Approved policy issue

Adopted by Pocket Money Adventures CIC on 2 October 2026.

Signed electronically: Nathan Waldron, Director and Designated Safeguarding Lead.

Signed electronically: Bernadette Houlton, Director and Deputy Designated Safeguarding Lead.

Typed electronic signatures in the established policy format.

Recognise and log

Recognise a request in any format, without a required form, channel, reason or legal wording. Forward to dpo@ the same day; log receipt date, requester, requested data, responsible person and deadline. Acknowledge within three working days as an internal target.

Identity, children and representatives

Seek only proportionate evidence where identity or authority is genuinely uncertain; do not routinely demand two identity documents. A child's access right belongs to the child. Assess competence, best interests, parental responsibility and representative authority; Article 8's online-consent age is not the access-right threshold. Do not disclose another parent's personal data simply because the requester has parental responsibility.

Clock and clarification

Respond without undue delay and normally within one calendar month. Calculate and log the applicable deadline under current ICO rules. Where necessary identity/authority evidence is requested, explain the effect on the clock. For a SAR, reasonably required clarification can pause the clock from the request for clarification until clarification is received, with resumption under the current rules. Do not seek clarification to create delay. Supply information that can reasonably be provided without clarification within the applicable period.

Search

Make reasonable and proportionate searches of actual relevant mailboxes, files, paper records, systems, suppliers and archives documented in the RoPA. Log locations, search terms, dates and results. Do not assume that analytics or pseudonymous records are outside scope.

Assess disclosure and exemptions

Provide the person's data and required Article 15 information. Consider third-party rights and each applicable exemption on its actual conditions; do not redact every third-party reference automatically. Seek safeguarding advice for sensitive child records. Document each withholding decision and reasons; do not promise full confidentiality against lawful access rights.

Extensions, fees and refusal

Up to two additional months may be available for complexity or multiple requests; notify within the first month with reasons. Missing an internal target alone does not justify extension. Normally provide data free. Only use lawful fee/refusal grounds, such as a demonstrably manifestly unfounded or excessive request, and record the assessment. Explain ICO complaint and court rights.

Secure delivery and record

Use an appropriate secure format and verified recipient; honour a reasonable requested format. Record what was provided, redactions, reasoning, recipient verification, delivery date and closure. Retain the necessary audit record normally for six years subject to periodic review, minimisation and legal holds; avoid retaining unnecessary duplicate full data.

Escalation and parallel breaches

Escalate uncertainty or likely missed deadlines promptly to the data protection lead. A discovered breach starts the breach procedure separately; it does not suspend the access request. Follow current ICO right-of-access guidance rather than an obsolete local rule.

Issue control: current approved issue dated 2 October 2026. Earlier issues are archived. Policy approval does not complete host agreements, individual acknowledgements or venue checks.