Subject access request checklist (UK)

A one-page working checklist for responding to a subject access request under the UK GDPR. Checked against ICO guidance and the Data (Use and Access) Act 2025 on 14 October 2026.

> General guidance, not legal advice. For complex requests, exemptions or disputes, read the ICO guidance and take advice.

1. Log the request

- [ ] Record the date received. A request can be made verbally or in writing, to anyone in the organisation.
- [ ] Work out the deadline: one month, counting the day of receipt as day 1. Same date next month; if that date doesn't exist, the last day of that month; if it falls on a weekend or bank holiday, the next working day.
- [ ] If you ask for proof of identity, the month runs from when you receive it (UK GDPR Art. 12A, in force 5 February 2026).
- [ ] Check whether the request is manifestly unfounded or excessive. If not, it is free.

2. Scope the search

- [ ] Confirm what the person is asking for. If you reasonably need clarification to identify the information, ask promptly: the clock stops until they reply.
- [ ] List every place you hold data: email, shared drives, document stores, HR and CRM systems, paper files, scanned archives, chat tools, backups.
- [ ] List search terms: full name, maiden or previous names, nicknames, email addresses, phone numbers, staff or customer IDs, account numbers, National Insurance number.

3. Search reasonably and proportionately

- [ ] Search each system with each term. The law requires a reasonable and proportionate search (UK GDPR Art. 15(1A), Data (Use and Access) Act 2025 s.78).
- [ ] Include scanned documents and attachments, not only text you can type-search.
- [ ] Record what you searched, where, with which terms, and why you stopped. This is your evidence the search was proportionate.

4. Review and prepare

- [ ] Remove material that isn't the requester's personal data.
- [ ] Consider third-party data and whether any exemption applies. Redact where needed and record why.
- [ ] Prepare the supporting information: purposes, categories of data, recipients, retention period, source, and the person's rights.

5. Respond

- [ ] Send a copy of the personal data and the supporting information securely, in a commonly used electronic form if the request was electronic.
- [ ] If the request is complex or one of several, you may extend by up to two further months. Tell the person within the first month and explain why.
- [ ] Keep a record of the response, the search log and any redaction decisions.

Sources: ICO, Right of access: https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/individual-rights/right-of-access/ · Data (Use and Access) Act 2025 s.76: https://www.legislation.gov.uk/ukpga/2025/18/section/76 · s.78: https://www.legislation.gov.uk/ukpga/2025/18/section/78

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