Nexus Education Schools Trust

Subject Access Requests (SARs) – Key Changes under the Data (Use and Access) Act 2025

This one-page summary outlines the key updates to Subject Access Requests (SARs) under the Data (Use and Access) Act 2025, specifically for UK schools. These changes aim to reduce administrative burden while maintaining individuals' data rights.

1. Reasonable and Proportionate Search

Schools are now legally required to conduct only a 'reasonable and proportionate' search for personal data. This means you are not expected to search every system or archive—only those likely to contain relevant data. This helps reduce the burden of responding to overly broad or excessive requests.

2. "Stop the Clock" Provision

If a SAR is unclear or too broad, schools can pause the one-month deadline while seeking clarification from the requester. The response clock resumes once the requester provides the necessary information.

3. Timeframes and Extensions

The standard response time remains one calendar month. However, schools may extend this by up to two additional months if the request is complex or involves large volumes of data. The requester must be notified of the extension within the first month.

4. Charging Fees

Schools may charge a reasonable fee for requests that are manifestly unfounded or excessive, or for additional copies of the same data. This helps manage resource use and discourages misuse of the SAR process.

5. Grounds for Refusal

Schools can refuse or limit a SAR if:
- It would involve disproportionate effort
- It includes third-party data that cannot be disclosed
- It could cause serious harm to the requester or others