

Subject Access Request (SAR) Procedure

Creswell Parish Council

1. Purpose

This procedure sets out how Creswell Parish Council (the Council) will handle Subject Access Requests (SARs) in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

It ensures that individuals can exercise their right to access personal data held about them in a lawful, timely, and transparent manner.

2. Scope

This procedure applies to all personal data held by the Council in any format, including: - Electronic records - Emails and correspondence - Personnel records - CCTV (if applicable) - Paper files

3. Roles and Responsibilities

Clerk to the Council (Data Protection Lead)

- Acts as the main point of contact for SARs
- Logs and manages requests
- Coordinates responses
- Ensures compliance with statutory deadlines

Councillors and Staff

- Must forward any SAR immediately to the Clerk
 - Assist in locating personal data when requested
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4. What is a Subject Access Request?

A SAR is a request from an individual asking: - Whether the Council holds their personal data - To access that data - To understand how it is being used

Requests can be made: - In writing (email, letter, social media) - Verbally (must be recorded)

5. Receiving Requests

A valid SAR must include: - Sufficient information to identify the requester - Enough detail to locate the data requested

The Council may request: - Proof of identity (e.g. ID documents) - Clarification if the request is unclear

6. Logging and Acknowledgement

- All SARs will be recorded in a SAR Register
- Acknowledgement will be issued within **3 working days**

Template – Acknowledgement

We acknowledge receipt of your Subject Access Request dated [date].
We will respond within one calendar month in accordance with data protection legislation.

7. Time Limits

- Standard response time: **1 calendar month**
 - May be extended by up to **2 further months** for complex requests
 - The requester will be informed if an extension is required
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8. Identity Verification

Before releasing data, the Council must be satisfied of the requester's identity.

Acceptable forms of ID may include: - Passport - Driving licence - Utility bill

Processing will pause until identity is verified.

9. Searching for Information

The Clerk will: 1. Identify relevant systems and records 2. Request searches from staff if necessary 3. Compile all relevant personal data

10. Reviewing Information

Before disclosure, the Council will: - Check for third-party data - Apply exemptions where necessary - Redact information that cannot be disclosed

11. Exemptions

Information may be withheld where exemptions apply, including: - Third-party personal data - Confidential information - Legal privilege

Any refusal will be clearly explained.

12. Providing the Response

The response will include: - Confirmation of whether data is held - A copy of the personal data - Information on how the data is used

Data will be provided: - Electronically where possible - In a secure format

13. Fees

SARs are normally free of charge.

A reasonable fee may be charged if: - The request is manifestly unfounded or excessive - Additional copies are requested

14. Refusals

Requests may be refused if: - They are manifestly unfounded or excessive - Identity cannot be verified

15. Internal Review

Applicants may request a review of the response.

- Reviews will be handled by a different officer or the Council
- Response within **1 month**

16. Complaints

If dissatisfied, individuals may contact the Information Commissioner's Office (ICO).

17. Records Management

The Council will: - Maintain secure records - Follow retention schedules - Ensure personal data is accurate and up to date

18. Monitoring and Review

- This procedure will be reviewed annually
 - The SAR Register will be monitored for compliance
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19. SAR Workflow (Summary)

1. Request received → logged
 2. Identity verified
 3. Acknowledged within 3 days
 4. Data located and reviewed
 5. Response issued within 1 month
 6. Review (if requested)
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Adopted by Creswell Parish Council on: 4th May 2026

Next Review Date: May 2027