



## **Data Protection Subject Access Request (SAR) Procedure**

### **Purpose:**

This procedure sets out how Milton Malsor Parish Council handles requests from individuals to access their personal information. The Council is committed to compliance with UK GDPR and the Data Protection Act 2018.

### **Scope:**

Applies to all personal data held by the Council relating to living individuals.

### **Key Principles:**

- SARs must normally be responded to within 1 month of receipt.
- Responses are free of charge, unless a request is manifestly unfounded, excessive, or repetitive, in which case a reasonable fee may be charged.

## **1. Receiving a SAR**

### **Step 1: Confirm validity**

- Must be in writing (letter, email, or other verifiable electronic communication).
- Ensure the request contains enough information to identify the data requested. If unclear, request clarification.

### **Step 2: Verify identity**

- Confirm the requester is the person the data relates to.
- Acceptable proof: passport, photo driving licence, or other official ID and proof of address (e.g., utility bill).

## **2. Locating Personal Data**

- Determine which records contain the requested data.
- Use the Council's data processing map to locate relevant systems.
- Personal data includes information that identifies a living individual (e.g., name, address, email) and may include opinions about them.

If no personal data is held, inform the requester immediately.

## **3. Screening Data**

- Identify any information that may be exempt from disclosure.
- Seek legal advice before applying exemptions.

Common exemptions include:

- References given to others
- Publicly available information
- Crime and taxation records
- Management or internal communications (e.g., restructures)
- Negotiations with the requester
- Regulatory activities (planning enforcement, noise complaints)
- Legal advice and litigation
- Personal data of third parties

#### **4. Redacting Third-Party Data**

- Any personal information about other individuals must be redacted unless consent is given.

#### **5. Preparing the Response**

Include the following minimum information, as required by UK GDPR:

- a) Purpose(s) of processing
- b) Categories of personal data
- c) Recipients (or categories) of personal data, including international transfers
- d) Storage period or criteria used to determine retention
- e) Rights to rectification, erasure, restriction of processing, or objection
- f) Right to lodge a complaint with the ICO
- g) Source of the data if not collected directly from the requester
- h) Existence of automated decision-making, including profiling, and its consequences

Include a copy of the personal data unless exemptions apply.

#### **6. Logging SARs**

Maintain a SAR log containing:

- Date of receipt
- Identity of data subject
- Summary of the request
- Compliance decision
- Date of response

#### **7. Sample Response Templates**

##### **7.1 Full Disclosure**

*Dear [Name]  
Thank you for your SAR dated [date]. Please find enclosed your personal data.*

*[Include points a–h above]*

Copyright of the data belongs to the Council or third parties and must not be copied or shared without permission.

## 7.2 Partial Disclosure

*Dear [Name]*

*Thank you for your SAR dated [date]. Some of the requested data is exempt and has been removed/redacted.*

*[Include points a–h above and reason for redaction]*

## 7.3 Refusal to Disclose

*Dear [Name]*

*Thank you for your SAR dated [date]. We cannot provide the requested personal data due to the following exemption(s): [explain reason]*

## 8. Review and Update

- This procedure must be reviewed every 2 years or sooner if legislation changes.
- Next review date: March 2028

**Reviewed by Milton Malsor Parish Council:** March 2026

**Adopted by Milton Malsor Parish Council:** April 2026

**Next Review Date:** March 2028

