

## **Carlton Scroop and Normanton on Cliffe Parish Council:**

### **Subject Access Request Procedure**

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Proposed and Seconded by councilors: Proposed by Councillor England, seconded by Councillor Thomas

Chair of the Council: Alan Thomas

Clerk / Responsible Financial Officer: Florence Hill

### **Subject Access Request Procedure**

#### 1. Purpose

This procedure outlines how individuals (staff, councillors, residents, or other data subjects) can request access to personal data held by the Council.

It ensures:

- Compliance with UK GDPR and the Data Protection Act 2018
- Timely and secure responses to requests
- Proper recording and accountability

#### 2. Scope

This procedure applies to all personal data held by the Council, including:

- Electronic records (Google Drive, Council email)
- Paper records
- Audio, video, or CCTV records

It applies to requests made by:

- Residents
- Staff
- Councillors

- Volunteers
- Contractors

### 3. Making a Subject Access Request

1. Requests must be made in writing (email or letter) to the Clerk.
2. Requests must include:
  - Name of the requester
  - Contact details
  - Description of the data requested
  - Any additional information to help locate the data
3. No specific form is required, but the Council may provide a SAR form for convenience.

Contact:

Clerk to Carlton Scroop and Normanton Parish Council: [clerk@carltonscroopnormanton-pc.gov.uk](mailto:clerk@carltonscroopnormanton-pc.gov.uk)

### 4. Verifying the Requester

Before processing, the Clerk may:

- Verify the identity of the requester (e.g., photo ID, address verification)
- Confirm the relationship to the data if acting on someone else's behalf

This ensures personal data is not disclosed to unauthorised individuals.

### 5. Responding to the Request

1. Timeframe: The Council must respond within 1 calendar month of receipt of the request.
  - The period may be extended by a further 2 months if the request is complex or numerous records are involved.
  - The requester will be informed of any extension.
2. Format of Response:
  - Personal data will be provided in a structured, commonly used, and machine-readable format if requested electronically.
  - Paper records may be provided as copies.
3. Information to Provide:
  - Confirmation that personal data is being processed
  - A copy of the personal data requested
  - Information about the purposes of processing
  - Categories of personal data processed

- Recipients of personal data (if any)
- Retention period or criteria
- Source of the data (if not obtained directly from the requester)
- Rights of the data subject, including the right to complain to the ICO

## 6. Refusing a Request

The Council may refuse a request or charge a reasonable fee if:

- The request is manifestly unfounded or excessive
- The request requires disproportionate effort to locate

Any refusal must be communicated in writing, providing reasons and information on the right to complain to the ICO.

## 7. Security and Confidentiality

- Personal data will be securely transmitted to the requester using safe methods (e.g., secure email, encrypted files, or hand delivery).
- Access to the data during processing is restricted to authorised personnel only (Clerk and Chair where required).

## 8. Recording and Accountability

The Council will:

- Maintain a Subject Access Request Log
- Record:
  - Date of receipt
  - Name of requester
  - Identity verification steps
  - Date of response
  - Data provided
  - Any extensions or refusals

This ensures compliance with GDPR accountability requirements.

## 9. Complaints

If a requester is dissatisfied with how their request was handled, they may:

1. Raise the issue with the Clerk or Chair of the Council
2. Lodge a complaint with the Information Commissioner's Office