

Ickleton PC: Subject Access Request Policy

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1. Introduction

Individuals have the right to access and receive a copy of their personal data, and other supplementary information. This is commonly referred to as a subject access request or 'SAR'. This policy sets out how Ickleton Parish Council, under the General Data Protection Regulations, will respond to Subject Access Request can be submitted and responded to. This Policy links to the Council's Privacy Policy. Individuals can make SARs verbally or in writing, including via social media. A third party can also make a SAR on behalf of another person.

2. Submitting a Subject Access Request

Individuals can make SARs verbally or in writing, including via social media. A third party can also make a SAR on behalf of another person. Preferably, Subject Access Requests should be made via email to the Clerk: email clerk@ickleton-pc.org.uk.

3. Receipt of a Subject Access Request

- The Clerk will immediately notify the Parish Council's Data Protection Officer of receipt of the SAR.
- The Clerk will endeavour to acknowledge receipt of the Subject Access Requests in writing (either letter or electronic format) within 10 working days.

- The Clerk will determine whether a request has been made under the Data Protection legislation. If the request falls under the Data Protection legislation the request will be processed. If the request does not fall under the legislation the Council will respond the data subject to inform them that no further action can be taken.
- The Clerk will verify the identity of the data subject and, if required, will request any further evidence on the identity of the data subject. This may include identity documents, for example: passport, driving licence, tenancy agreement or utility bill.
- The request will be checked to see if it is sufficiently substantiated and that it is clear what data is requested. If it is not clear additional information will be requested.
- The request will be verified to see if it is unfounded or excessive. A Subject Access Request is likely to be manifestly unfounded or excessive where it repeats a request to which the council has already responded. If so found, the Council may refuse to act upon the request or may charge a reasonable fee.
- If the requested information includes data on other data subjects, this data will be redacted. If the data cannot be removed, a consent form will be required from the other data subjects prior to any supply of data.

4. Responding to a Subject Access Request

- Requests will be responded to within one calendar month after receipt. If the request is more complex, an extension of two further calendar months may apply. The data subject will be informed.
- The Council will perform a reasonable search for the requested information. If the Council is unable to provide the information requested, the data subject will be notified within one calendar month of receipt of the request.
- As far as possible requests will be responded to in the format they are received. In most circumstances, a fee will not be charged.
- The information will be disclosed securely and in an accessible, concise and intelligible format. In cases where this is impossible or would involve undue effort alternative arrangements will be agreed e.g. to view the personal data on screen or inspect files on premises.
- A record will be maintained of all Subject Access Requests allowing the Clerk to report to Council on the volume of requests and compliance against the statutory timescale.

5. Data Subject Rights

You have a number of other rights in relation to your personal data. You can require the council to:

- rectify inaccurate data.
- stop processing or erase data that is no longer necessary for the purposes of processing.
- stop processing or erase data if your interests override the council's legitimate grounds for processing data (where the council relies on our legitimate interests as a reason for processing data)

- stop processing or erase data if processing is unlawful; and
- stop processing data for a period if data is inaccurate or if there is a dispute about whether or not your interests override the council's legitimate grounds for processing data.
- Complain to the Information Commissioner. You can do this by contacting the Information Commissioner's Office directly on 0303 123 1113. Full contact details can be found on the Information Commissioner's Office website (www.ico.org.uk).

6. Reporting Procedure, Records and Confidentiality

Confidentiality will be maintained at all times. Information will be handled and disseminated on a need-to-know basis only. All Subject Access Requests will be reported to the Council by the Clerk as soon as reasonably possible with personal details redacted or removed. Records will be kept securely and confidentially by the Parish Clerk.

Version History

The version history panel provides a history of the changes made to the document from the initial draft to the current version.

Version	Changes made	Date	Made by
0.1	Draft created	7 th October 2025	Clerk
1.0	Approved for publication at Council meeting	15 th October 2025	Clerk