



SUBJECT ACCESS REQUEST (SAR) POLICY

Purpose

This policy sets out how Hannington Parish Council (“the Council”) will respond to Subject Access Requests (SAR) in accordance with UK General Data Protection Regulation (UK GDPR) the Data Protection Act 2018 (DPA 2018) and the Data (Use and Access) Act 2025 (DUAA 2025).

Introduction

Individuals (data subjects) have the right to obtain confirmation that their personal data is being processed and have access to that data as per Article 15 and Article 12 of UK GDPR.

Personal data means any information relating to an identified or identifiable living individual. The processing of personal data is governed by UK data protection legislation.

This policy explains the Council’s internal process for handling SARs and ensures requests are managed in a consistent and compliant manner.

When responding to a SAR, the Council will undertake searches that are reasonable and proportionate in the circumstances, as reflected in the UK GDPR (as amended by the DUAA 2025).

Further information about how the Council processes personal data is set out in the Council’s Privacy Notices and Data Protection Policy.

Scope

This policy applies to:

- All SARs made to the Council.
- All councillors, employees and contractors handling personal data.
- All personal data held in electronic or manual form.

ROLES AND RESPONSIBILITIES

Data Controller

Hannington Parish Council is the data controller.

Data Processing

The Clerk is responsible for:

- Coordinating responses to SARs.
- Maintaining the SAR log.
- Advising staff and members.
- Ensuring statutory timescales are met.

Staff and Members (Councillors)

All staff and Members must:

- Recognise potential SARs.
- Forward requests immediately to the Parish Clerk.
- Assist with searches when requested.

What is a Subject Access Request (SAR)?

A Subject Access Request (SAR) is a request from an individual asking whether the Council is processing their personal data and, if so, requesting:

- Access to their personal data,
- The supplementary information required under Article 15 of UK GDPR.

Requests may be made verbally or in writing in accordance with Article 15 and Article 12 of UK GDPR. A requestor does not need to use the words “Subject Access Request”, “SAR” or “UK GDPR” for the request to be valid. Any request for access to an individual’s own personal data should be treated as a potential SAR and referred to the Parish Clerk promptly.

Submitting a SAR

A request form can be downloaded from our website. [[Click to download form](#)]

Or you can apply directly via the Information Commissioner’s Website.

<https://ico.org.uk/for-the-public/make-a-subject-access-request/>

Processing a SAR

Upon receipt of a SAR, the Parish Clerk will:

- Log the request in the SAR register. This will include:
 - Date received.
 - Requester details.
 - Summary of request.
 - ID verification status (only where reasonable and necessary).
 - Response deadline (within one calendar month).
 - Outcome.
 - Exemptions (if any).

- Acknowledge receipt.
- Verify identity where reasonable and necessary. Where verification is required, the Council may request appropriate documentation.
- Seek clarification if the request is unclear. The one-month response deadline may be paused to allow the Council to seek clarification from the individual.
- Assess validity, including whether the request is manifestly unfounded or excessive.
- Act within the statutory timescale, namely without undue delay and within one calendar month of receiving the request. Where the Council has reasonably requested proof of identity, the response period will commence once that information has been received. (Article 12(3) of UK GDPR).
- If the request is complex or numerous, the Council may extend the response period by up to two further months. The requestor will be advised within the first month if an extension is required.
- Conduct thorough searches of systems under the Council's control including (where applicable):
 - Email systems.
 - Electronic records.
 - Paper files.
 - Cloud storage.
 - Mobile devices used for council business.
 - Social media used for council business.
 - Consider whether disclosure of third-party personal data is permitted under the DPA 2018 before releasing information.
 - The Council will provide information in electronic form when the request was made electronically unless otherwise requested. The information provided will include a copy of the personal data and any required supplementary information as required by Article 15(3) of UK GDPR.

All records will be retained in accordance with the Council's Data Retention Policy.

Recording Decisions

The Council will keep a record of:

- Searches undertaken.
- Decisions made.
- Exemptions relied upon.
- Reasons for refusals.
- Correspondence with the requester.
- Dates of key actions taken.

Fees

SARs are normally free of charge, however the Council **may** charge a reasonable fee when permitted by Article 12(5) UK GDPR. For example where requests are manifestly unfounded or excessive or for repeated copies.

Exemptions

The Data Protection Act 2018 contains many exemptions where information can be withheld. Where data is withheld the Council will explain the reason(s).

Refusing a Request

The Council may refuse a request where permitted by law, for example where requests are manifestly unfounded or excessive or for repeated copies.

If refusing a request the Council will (within one calendar month) explain the reasons and inform the individual of their right to complain or seek judicial remedy. All refusals will be documented.

Complaints

If a requester is dissatisfied, they should use the Council's complaints procedure in the first instance. However, individuals also have the right to complain to the Information Commissioner's Office (ICO).

Policy Review

All Members and staff must adhere to this policy.

This policy will be reviewed every three years or earlier if required by changes in legislation or guidance issued by the Information Commissioner's Office (ICO).

Date of Policy Adoption	3 September 2026
Date of Policy Review	-
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