

DEENE AND DEENETHORPE PARISH COUNCIL

SUBJECT ACCESS REQUEST (SAR) PROCEDURE

1. Purpose and Core Rules

This procedure must be followed when an individual contacts Deene and Deenethorpe Parish Council to request access to their personal information held by the Council.

- **Timeline:** Requests must be completed without undue delay and at the latest within **one calendar month** of receipt. The clock starts the day the request is received (regardless of format) and can only be paused if official identity verification or necessary scope clarification is actively pending.
- **Fees:** SARs must be provided **free of charge**. A reasonable administrative fee may only be charged if a request is manifestly unfounded or excessive, particularly if it is repetitive.

2. Step 1: Assessing Request Validity

A SAR does not need to mention "Data Protection", "UK GDPR", or be submitted on a specific form. It is valid if an individual clearly asks to see what personal data the Council holds about them.

- **Format:** A request can be made **in writing** (letter, email, social media) or **verbally** (over the phone or in person). If a request is made verbally, the Clerk must document the details immediately in writing and send a copy to the applicant to confirm accuracy.
- **Clarification:** If a request is too broad, the Council may ask the applicant for further details to help locate the information, but the Council cannot stonewall or delay unreasonably.

3. Step 2: Verifying Identity

The Council must be confident that the requester is the data subject (or has formal legal authority, like a Power of Attorney, to act on their behalf).

- Verification checks must be **reasonable and proportionate**.
- Staff should not demand official photo ID if the requester is a local resident already well-known to the Clerk.
- If identification is genuinely required, the Council will request electronic or physical copies of a utility bill, council tax statement, or driving licence. Forcing physical attendance at the council office is not mandatory.

4. Step 3: Locating and Screening Information

- Use internal file structures to search council emails, shared drives, paper filing cabinets, and minutes.
- If no data is held, notify the requester immediately.
- **Redaction:** Before sending out files, any personal data belonging to third-party individuals must be permanently redacted unless those individuals have given explicit consent.

- **Exemptions:** Apply statutory exemptions (such as legal professional privilege, ongoing negotiations, or management forecasting) cautiously and document the justification.

5. Step 4: Preparing the Response

The response packet must include a copy of the personal data undergoing processing alongside an explanation covering:

- The purposes of the processing.
- The categories of personal data concerned.
- The recipients or categories of recipients (especially in third countries).
- The envisaged data retention storage period.
- The existence of rights to rectification, erasure, restriction, or objection.
- **The right to lodge an internal data complaint directly with the Council**, alongside the right to escalate to the Information Commissioner's Office (ICO) if dissatisfied.

SAMPLE RESPONSE LETTERS

Letter 1: Full Disclosure Response

[Name] [Address]

[Date]

Dear [Name of data subject],

Data Protection Subject Access Request

Thank you for your request dated [date] to access your personal data held by Deene and Deenethorpe Parish Council. We are pleased to enclose a copy of the personal information you requested.

[Insert mandatory text satisfying elements 5(a) to 5(h) outlining your processing purposes, storage periods, and data rights].

If you believe your data has been handled incorrectly, you have the right to lodge a formal data complaint directly with the Council by contacting the Clerk. If you remain unsatisfied with our internal review, you hold a statutory right to escalate your complaint to the Information Commissioner's Office (ICO) via their public portal. [\[1\]](#), [\[2\]](#)

Copyright in the personal data provided belongs to the Council or to another party. This material must not be copied, distributed, or reproduced without prior written consent.

Yours sincerely,

[Name/Clerk]

Deene and Deenethorpe Parish Council

Letter 2: Partial Disclosure (Exemptions/Redactions Applied)

[Name] [Address]

[Date]

Dear [Name of data subject],

Data Protection Subject Access Request

Thank you for your request dated [date] to access your personal data held by Deene and Deenethorpe Parish Council.

We have conducted a search across our council records and are pleased to enclose elements of the personal data you requested. However, some information has been redacted or withheld. This is because parts of the documents contained personal data identifying third parties who have not consented to disclosure, or fell under statutory exemptions (such as [insert reason, e.g., legal privilege/negotiations]).

[Insert mandatory text satisfying elements 5(a) to 5(h) outlining your processing purposes, storage periods, and data rights].

If you wish to dispute these redactions, you have a statutory right to lodge an internal data complaint with the Council directly. If our internal investigation does not resolve your concerns, you may escalate the issue to the Information Commissioner's Office (ICO).

Yours sincerely,

[Name/Clerk]

Deene and Deenethorpe Parish Council

DOCUMENT CONTROL BLOCK

- **Date Approved / Adopted:** 28/09/2026
 - **Date of Next Review:** 09/2027
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