



Subject Access Request (SAR) Guidelines

1. Purpose

Sturminster Newton Town Council ("the Council") is committed to respecting the rights of individuals in relation to their personal data. This policy sets out how the Council will respond to requests made by individuals to access their personal data, known as Subject Access Requests (SARs), in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

These guidelines supports the Council's Data Protection Policy and demonstrates compliance with the accountability principle.

2. Scope

The guidelines apply to:

- All SARs for personal data held by the Council;
- All formats of personal data, including paper records, electronic records, emails, CCTV footage and photographs;
- Requests relating to current and former employees, councillors, contractors, volunteers and members of the public.

Requests for information that do not relate to personal data are handled under the Council's Freedom of Information Policy or the Environmental Information Regulations, as appropriate.

3. What is a Subject Access Request?

A SAR is a request made by an individual (the data subject) to obtain confirmation that their personal data is being processed; and access to that personal data and related supplementary information.

A SAR does not have to mention "UK GDPR" or be labelled as a SAR to be valid.

4. Making a Subject Access Request

SARs:

- can be made in writing or verbally;
- may be submitted by email, letter or in person;
- should be directed to the Town Clerk, who acts as the Council's lead officer for data protection.

Where a request is made verbally, the Council may ask the individual to provide the request in writing to ensure clarity and accuracy.

5. Verification of Identity

Before releasing personal data, the Council must be satisfied as to the identity of the requester. Where necessary, the Council may request:

- proof of identity; and/or
- proof of authority if the request is made on behalf of another person.

The statutory response timescale will begin once sufficient identification has been received.

6. Timescales

The Council will respond to a SAR within one calendar month of receipt.

Where a request is complex or numerous, this period may be extended by up to two additional months, in accordance with UK GDPR. The requester will be informed if an extension is required.

7. Exemptions and Redactions

Not all information must be disclosed in response to a SAR. The Council will:

- apply exemptions permitted under the UK GDPR and Data Protection Act 2018;
- redact third-party personal data where disclosure would be unlawful; and
- ensure that disclosures do not prejudice legal proceedings, confidential references or other protected information.

Each request will be considered on a case-by-case basis.

8. Fees

SARs are normally free of charge.

A reasonable fee may be charged where a request is manifestly unfounded, excessive, or repetitive, or where additional copies are requested.

9. Records and Logging

All SARs will be:

- logged by the Town Clerk;
- retained in accordance with the Council's Records Retention and Disposal Policy; and
- handled confidentially and securely.

10. Right to Complain

If an individual is dissatisfied with how their SAR has been handled, they may:

- raise the matter with the Council in the first instance; and
- complain to the Information Commissioner's Office (ICO).

11. Review

Guidelines will be reviewed periodically and updated as required to reflect changes in legislation or guidance.

Approved on: 15 April 26

Review Due: April 27