

Subject Access Request Procedure 2026

Date reviewed: July 2026

Next review: July 2028

1. Introduction

1.1 This procedure is to be followed when an individual contacts Arlesey Town Council to request access to their personal information held by the Council. Requests must be completed within one calendar month, so it should be actioned as soon as it is received.

2. Receiving a Subject Access Request

2.1 A Subject Access Request must be made in writing (letter or email) by the data subject or a nominated representative.

2.2 The request should be made by the data subject and requires proof of identity and address to be provided within their communication, via one of the following documents:

- Current UK / EEA Passport
- UK Photocard Driving Licence, full or provisional
- Firearms Licence / Shotgun Certificate
- EEA National Identity Card
- Disabled Driver's Pass
- Financial statement issued by a bank, building society or credit card company (documents to have been issued within the last 3 months)
- Utility bill for supply of gas, electric, water or telephone landline (documents to have been issued within the last 3 months)

2.3 Requests received from a nominated representative require the data subject to provide a written permission document detailing the requestor's name, address, date of birth and contact details, together with a form of identification.

2.4 A Subject Access Request (SAR), must be forwarded immediately upon receipt, to the Town Clerk – Arlesey Town Council's designated Data Controller.

2.5 The Data Controller will determine if the SAR satisfies current Data Protection legislation requirements and whether any clarification is required on the search terms for the SAR.

2.6 An acknowledgement of SAR receipt should be sent by email/letter to the requestor noting the date of receipt and the due date for the response.

2.7 The SAR will be logged by the Data Controller, noting date of receipt, the name of the sender and the date of response.

3. Processing the Request

3.1 The Data Controller will consider the type of information requested and use the data processing map to determine where information/records are stored and perform a reasonable search for the requested data.

3.2 Personal data is defined as relating to a living individual who can be identified from the data, including name, address, email address and database information, and can include expressions of opinion about the individual. If no personal data is held pertaining to the requestor (data subject) communication confirming this (email/letter) will be issued to the requestor.

3.3 In some cases, emails and documents may contain the personal information of other individuals who have not given their consent to share their personal information with others. If this is the case, the other individual's personal data must be redacted before the SAR is sent out.

3.4 Once all retrieved data has been collated, the Data Controller will screen the documentation to determine whether any of the documents are exempt from disclosure.

3.5 Exemptions to disclosure are set out in the Data Protection Act 2018 and identified on the Information Commissioner's website and include:

- Crime and taxation: general
- Crime and taxation: risk assessment
- Legal professional privilege
- Functions designed to protect the public
- Regulatory functions relating to legal services, the health service and children's services
- Other regulatory functions
- Judicial appointments, independence and proceedings
- Journalism, academia, art and literature
- Research and statistics
- Archiving in the public interest
- Health, education and social work data
- Child abuse data
- Management information
- Negotiations with the requester
- Confidential references
- Exam scripts and exam marks
- Other exemptions

3.6 The Data Controller will seek legal advice before applying exemptions.

4. Preparing a Response

4.1 A response should be sent via email or post within one calendar month of receiving the request.

4.2 The deadline for response to the SAR can be extended by a further two months if the request is complex or a number of requests have been made by the data subject. The extension should be notified in writing to the data subject at the earliest opportunity with an explanation around the circumstances for the extension.

4.3 Preparation of the SAR response should include, as a minimum, the following information:

- a. The purposes of the processing;
- b. The categories of personal data concerned;
- c. The recipients or categories of recipients to whom personal data has been or will be disclosed, in particular in third countries or international organisations, including any appropriate safeguards for transfer of data;
- d. Where possible, the envisaged period for which personal data will be stored, or, if not possible, the criteria used to determine that period;

- e. The existence of the right to request rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- f. The right to lodge a complaint with the Information Commissioner's Office ("ICO");
- g. If the data has not been collected from the data subject: the source of such data;
- h. The existence of any automated decision-making, including profiling and any meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

4.4 All SARs should be recorded and include: date of receipt, identity of the data subject, summary of the request, indication as to whether the Council can comply, and date information is issued to the data subject.

5. Fees for Responses

5.1 Subject Access Requests should be provided free of charge. However, the Town Council is able to charge a reasonable fee when a request is manifestly unfounded or excessive, particularly if repetitive.

6. Refusing a Request

6.1 The Town Council will only refuse to provide the information if an exemption or restriction applies, or if the request is manifestly unfounded or excessive.

7. Changes to this Procedure

7.1 The Town Council will keep this SAR Procedure under review and publish any updates on its website at www.arlesey-tc.gov.uk.

8. Contact Details

8.1 Individuals are requested to contact the Town Council if they have any questions about this, it's Privacy Notice or the personal data the Town Council holds about them, or to exercise any or all of the relevant rights, queries or complaints.

Correspondence: The Data Controller, Arlesey Town Council, Community Centre, High Street, Arlesey, Bedfordshire, SG15 6SN

Email: clerk@arlesey-tc.gov.uk

Telephone: 01462 733722

9. Complaints

9.1 In the event of a complaint regarding the way personal data has been processed by the Town Council, individuals are able to refer their complaint to the Town Council Data Controller at clerk@arlesey-tc.gov.uk , Tel: 01462 733722 or to the ICO at casework@ico.org.uk / Tel: 0303 123 1113.

10. Alignment with Other Policies of the Town Council

This Subject Access Request Procedure should be read in conjunction with the following policies of the Council:

- Privacy Notice and Privacy Policy

- Data Protection Policy
- Data Breach Policy