

SUBJECT ACCESS REQUEST (SAR) PROCEDURE (UK GDPR)

Adopted: [11/03/26] | Review: March 2027 | Owner: Parish Manager

1. PURPOSE

To provide a clear, consistent process for handling the right of access under UK GDPR.

2. RECEIVING A SAR

Requests may be verbal or written, including via social media. Record date/time on receipt. Encourage written format for clarity. No fee unless manifestly unfounded or excessive.

3. VERIFY IDENTITY

Request sufficient ID where identity is not clear (e.g., council tax bill + photo ID). For representatives, obtain written authority. For children, assess competence (Gillick-type maturity) and parental responsibility.

4. SCOPE & CLARIFICATION

If large volumes are involved, ask the requester to narrow scope (date ranges, keywords, systems). Pause the clock until clarification is received.

5. LOCATING DATA

Search email (council domain only), Electronic Document and Records Management Systems (EDRMS)/shared drives, finance systems, website CMS, paper files, backups (where reasonable), and processors. Log systems searched and results.

6. THIRD-PARTY DATA & EXEMPTIONS

Redact third-party data unless consent or it is reasonable to disclose. Apply statutory exemptions where relevant (e.g., management information, negotiations, legally privileged material, crime & taxation). Document each exemption used.

7. FORMAT OF RESPONSE

Provide a copy of personal data in a commonly used electronic format unless the requester asks otherwise or provides reasonable grounds for hard copy. Include: purposes, categories, recipients, retention, source, rights, complaint route.

8. TIME LIMITS

Respond within one month of receipt (or of ID/clarification). One two-month extension is allowed if requests are complex; inform the requester within one month and explain why.

9. QUALITY & REDACTION

Use a copy set for disclosure; apply consistent redactions; add context notes if needed; keep an internal unredacted set for audit. Ensure PDFs are tagged and accessible.

10. COMMUNICATION

Maintain courteous, neutral tone. Keep a SAR log with dates, actions, decisions, and sign-off. Offer reasonable adjustments (large print, HTML, audio).

11. APPEALS & COMPLAINTS

If dissatisfied, the requester may complain to the Parish Manager and then to the ICO. Provide contact details in the response letter.

version number	Purpose/change	Author	Date
0.1	Initial draft	KG	7/20
0.2	Amended	KG	7/22
0.3	Amended	KG	05/02/26