



Subject Access Request (SAR) Policy

1. Purpose of this Policy

This policy explains how East Wittering and Bracklesham Parish Council handles Subject Access Requests (SARs) in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. It ensures that individuals can exercise their rights to access personal data held about them, while enabling the Parish Council to comply with its legal obligations in a consistent, transparent, and lawful manner.

2. Scope

This policy applies to:

- All elected members of the Parish Council
- All employees, contractors, and volunteers
- All personal data processed by the Parish Council, in both electronic and paper formats

It covers SARs made by individuals whose personal data is processed by the Parish Council.

3. Legal Framework

This policy is based on the following legislation:

- UK General Data Protection Regulation (UK GDPR), Articles 12 and 15
- Data Protection Act 2018
- Freedom of Information Act 2000 (where relevant and distinct from SARs)

4. What is a Subject Access Request?

A Subject Access Request is a request made by an individual to obtain confirmation that their personal data is being processed and, if so, to be provided with:

- A copy of their personal data
- Information about how and why their data is processed

A SAR can be made verbally or in writing (including email or social media) and does not need to refer explicitly to "subject access" or "UK GDPR" to be valid.

5. Rights of the Data Subject

Under UK GDPR, individuals have the right to:

- Access their personal data
- Be informed about how their data is used
- Request rectification or erasure of inaccurate data
- Restrict or object to processing in certain circumstances

- Lodge a complaint with the Information Commissioner's Office (ICO)

6. Making a Subject Access Request

Requests should be directed to:

The Clerk / Proper Officer

East Wittering and Bracklesham Parish Council
Bracklesham Barn, Beech Avenue, Bracklesham, West Sussex PO20 8HU
enquiries@eastwitteringbrackleshampc.org.uk
01243 675888

While requests may be made verbally, the Parish Council may ask for the request to be confirmed in writing to ensure clarity and accuracy.

7. Verification of Identity

Before responding to a SAR, the Parish Council must be satisfied as to the identity of the requester. If necessary, reasonable proof of identity may be requested. The statutory response period will begin once identity has been verified.

8. Timescales for Response

The Parish Council will respond to a SAR without undue delay and in any event within one month of receipt.

This period may be extended by up to two further months where requests are complex or numerous. If an extension is required, the requester will be informed within one month of receipt, together with reasons for the delay.

9. Fees

Subject Access Requests are normally processed free of charge.

A reasonable fee may be charged, or the request refused, where a request is manifestly unfounded or excessive, particularly if it is repetitive. Any fee will be based on administrative costs and explained to the requester.

10. Exemptions and Refusals

Some personal data may be exempt from disclosure under the Data Protection Act 2018, including but not limited to:

- Personal data relating to other individuals
- Information subject to legal professional privilege
- Confidential references

Where information is withheld or a request is refused, the Parish Council will clearly explain the reasons and inform the requester of their right to complain.

11. Format of Response

The Parish Council will provide the requested information:

- In a commonly used electronic format where the request is made electronically, unless otherwise requested
- In hard copy where appropriate

Responses will include:

- Confirmation that personal data is being processed
- A copy of the personal data
- Supplementary information required by UK GDPR

12. Records Management

The Parish Council will keep a record of all SARs received, including:

- Date of receipt
- Nature of the request
- Actions taken
- Date of response

These records will be retained in accordance with the Council's retention schedule.

13. Roles and Responsibilities

- The Parish Clerk / Proper Officer is responsible for coordinating and responding to SARs.
- Councillors and staff must promptly forward any SARs they receive to the Clerk.
- All personnel must cooperate fully in locating relevant personal data.

14. Complaints

If a requester is dissatisfied with the handling of their SAR, they may complain to:

Information Commissioner's Office (ICO)

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

www.ico.org.uk

15. Review of this Policy

This policy will be reviewed periodically and at least every two years, or sooner if required by changes in legislation or guidance.

Adopted by East Wittering and Bracklesham Parish Council

Date: 26/02/2026

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