



General Data Protection Regulations (GDPR) Subject Access Request (SAR) Policy

1. Scope

All personal data processed by Yalding Parish Council (YPC) is within the scope of this policy.

This policy excludes personal data that is requested as a matter of routine by data subjects.

Data subjects are entitled to ask:

1. Whether YPC is processing any personal data about them, and if so, to be given:
 - A description of the personal data
 - The purposes for which it is being processed
 - Details of who will be allowed to see the personal data
2. To be given a copy of the information and to be told about the sources from which YPC derived the information.

YPC does not carry out automated decision making or profiling.

2. Responsibilities

The Clerk is responsible for the application and effective working of this policy, and for reporting to The Council on SARs.

The Clerk is responsible for handling all SARs.

3. Submitting a Subject Access Request

SARs must be made in writing to The Clerk. A request does not need to mention GDPR or use the phrase Subject Access Request. Any written request for personal data, including by

email, must be treated as a SAR. A SARs Form is available on The Council's website to assist applicants, but its use is optional. SARs are free of charge unless they are manifestly unfounded or excessive, in which case a reasonable fee may be charged.

4. The data subject must:

- Provide evidence of identity
- Identify the data being requested (if possible) and, where known, where it is held
- Understand that they may request all data held about them without specifying categories

The Clerk must record the date on which identity is verified and the request is confirmed.

5. Timescales

YPC must respond to a SAR within one month of receipt. Where a request is complex, an extension of up to two further months is permissible, however the data subject must be informed of the extension within the first month.

If the Council cannot provide the information requested, it must inform the data subject without delay and no later than one month after receipt.

YPC will not refuse a SAR solely because it is time consuming or difficult to process.

6. Collection and Review of Data

The Clerk will ensure that the requested data is collected within the required timeframe.

Collection may involve:

- Retrieving the specific data identified by the data subject, or
- Searching all relevant databases and filing systems (manual and electronic), including backups, archives and email folders

The Clerk must maintain a SAR log, including dates, actions taken, exemptions applied and the final outcome.

Data must not be altered or destroyed in order to avoid disclosure.

The Clerk is responsible for reviewing all documents to identify third party information and must either:

- Remove or redact third party data, or
- Obtain written consent from the third party before disclosure.

7. Exemptions

Some information may be withheld from a SAR where a UK GDPR or Data Protection Act 2018 exemption applies. These include:

- Crime and taxation - where disclosure would prejudice the prevention or detection of crime, the apprehension or prosecution of offenders, or the assessment or collection of tax
- Legal professional privilege - information that is subject to legal advice privilege or litigation privilege

- Management information - information processed for management forecasting or planning (e.g., redundancy planning) where disclosure would prejudice the conduct of the business
- Confidential references - references given by The Council about an individual (references received by The Council must normally be disclosed)
- Research, statistics and archiving - where data is processed solely for research or statistical purposes and disclosure would seriously impair the research.

Where an exemption applies, The Council will explain the reason for withholding information unless doing so would itself prejudice the purpose of the exemption.

8. Format of Response

Information will be provided to the data subject in electronic format unless otherwise requested.

All items disclosed must be listed on a schedule showing:

- The data subject's name
- The date on which the information is delivered

Adopted on 03 March 2026

To be reviewed annually at the Annual Parish Council Meeting (see minutes of that meeting).