



ALSTON MOOR PARISH COUNCIL

Subject Access Request Policy

Policy Statement

Individuals have the right to know what data is held on them, why the data is being processed and whether it will be given to any third party. They have the right to be given this information in a hard copy. This is known as a 'subject access request' or "SAR".

Scope

This policy applies to all councillors and employees, including full-time, part-time, temporary, and contract workers, as well as volunteers associated with Alston Moor Parish Council. The Parish Clerk will be responsible for managing any requests.

Procedure

An individual can make a SAR verbally or in writing, including on social media. A request is valid if it is clear that the individual is asking for their own personal data. An individual does not need to use a specific form of words, refer to legislation or direct the request to a specific contact.

An individual may ask a third party (eg a relative, friend or solicitor) to make a SAR on their behalf. You may also receive a SAR made on behalf of an individual through an online portal. Before responding, you need to be satisfied that the third party making the request is entitled to act on behalf of the individual. It is the third party's responsibility to provide evidence of their authority.

An individual is entitled to a copy of their personal data and to other supplementary information. If an individual makes a request electronically, you should provide the information in a commonly used electronic format, unless the individual requests otherwise.

When deciding what format to use, you should consider both the circumstances of the particular request and whether the individual has the ability to access the data you provide in that format. It is good practice to establish the individual's preferred format prior to fulfilling their request. Alternatives can also include allowing the individual to access their data remotely and download a copy in an appropriate format.

If an individual asks, you can provide a verbal response to their SAR, provided that you have confirmed their identity by other means. You should keep a record of the date they made the request, the date you responded, details of who provided the information and what information you provided.

As the controller of the information you are responsible for taking all reasonable steps to ensure its security.

Information required

Depending on the degree to which personal data is organised and structured, it will be necessary to search emails (including archived emails and those that have been deleted but are still recoverable), word documents, spreadsheets, databases, systems, removable media (for example, memory sticks, floppy disks, CDs), paper records in relevant filing systems etc.

It is not permitted to withhold personal data because the council believes it will be misunderstood; instead, an explanation should be provided with the personal data. The personal data must be provided in an “intelligible form”, which includes giving an explanation of any codes, acronyms and complex terms. The personal data must be supplied in a permanent form except where the person agrees or where it is impossible or would involve undue effort. The council may be able to agree with the requester that they will view the personal data on screen or inspect files at the Parish Council Office. Exempt personal data should be redacted from the released documents and an explanation provided as to why that personal data is being withheld.

What to do if the request involves information about other individuals?

Where possible, you should consider whether it is possible to comply with the request without disclosing information that identifies another individual. If this is not possible, you do not have to comply with the request except where the other individual consents to the disclosure or it is reasonable to comply with the request without that individual’s consent.

When responding to a complaint, the Parish Clerk must advise the requestor that they may complain to the Information Commissioner’s Office (“ICO”) if they remain unhappy with the outcome.

Date of policy: October 2025

Supersedes: Subject Access Request - incorrect information

Policy effective from: August 2026

Date for next review: August 2028