

KING'S SUTTON PARISH COUNCIL

Subject Access Requests Policy

When an individual contacts King's Sutton Parish Council to request access to their personal information held by the Council the following procedure shall be followed.

What to Do.

1. On receipt of a subject access request **forward** it immediately to the Clerk
2. Correctly **identify** whether a request has been made under the Data Protection legislation
3. The Clerk, and as appropriate, councillor, who receives a request to locate and supply personal data relating to a SAR must make a full exhaustive **search** of the records to which they have access.
4. All the personal data that has been requested must be **provided** unless an exemption can be applied.
5. **Respond** within one calendar month after accepting the request as valid.
6. Subject Access Requests must be undertaken **free of charge** to the requestor unless the legislation permits reasonable fees to be charged.
7. Councillors must ensure that the Clerk is **aware** of and follows this guidance.
8. Where a requestor is not satisfied with a response to a SAR, the council must manage this as a **complaint**.

How to do it.

1. Notify the Clerk upon receipt of a request.
2. Ensure a request has been received in writing where a data subject is asking for sufficiently well-defined personal data held by the council relating to the data subject. Clarify with the requestor what personal data they need. They must supply their address and valid evidence to prove their identity.
The council accepts the following forms of identification
 - Current UK/EEA Passport
 - UK Photocard Driving Licence (Full or Provisional)
 - Firearms Licence / Shotgun Certificate
 - EEA National Identity Card
 - Full UK Paper Driving Licence
 - State Benefits Entitlement Document* dated in the past 12 months
 - State Pension Entitlement Document* dated in the past 12 months
 - HMRC Tax Credit Document* dated in the past 12 months
 - Local Authority Benefit Document* dated in the past 12 months
 - State/Local Authority Educational Grant Document* dated in the past 12 months
 - HMRC Tax Notification Document
 - Disabled Driver's Pass
 - Financial Statement issued by bank, building society or credit card company+ dated in the past 3 months
 - Judiciary Document such as a Notice of Hearing, Summons or Court Order
 - Utility bill for supply of gas, electric, water or telephone landline+ dated in the past 3 months
 - Most recent Mortgage Statement
 - Most recent council Tax Bill/Demand or Statement
 - Tenancy Agreement
 - Building Society Passbook which shows a transaction in the last 3 months & address

KING'S SUTTON PARISH COUNCIL

3. Depending on the degree to which personal data is organised and structured, 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), tape recordings, paper records in relevant filing systems etc.
4. Do not withhold personal data because you believe it will be misunderstood; instead, provide an explanation with the personal data. Provide the personal data 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. You may be able to agree with the requester that they will view the personal data on screen or inspect files on our premises. Redact any exempt personal data from the released documents and explain why that personal data is being withheld.
5. Make this clear on forms and on the council website
6. Do this through the use of induction, performance and training, as well as through establishing and maintaining appropriate day to day working practices.
7. A database is maintained allowing the council to report on the volume of requests and compliance against the statutory timescale.
8. When responding to a complaint, advise the requestor that he/she may complain to the Information Commissioners Office (“ICO”) if he/she remains unhappy with the outcome.

Approved: 07 June 2018