



RUSTINGTON PARISH COUNCIL

SUBJECT ACCESS REQUEST POLICY

Subject Access Request (SAR) Response Policy

1. Purpose

This policy outlines Rustington Parish Council handles Subject Access Requests (SARs) in compliance with the Data (Use and Access) Act 2025 (DUAA) and UK GDPR. It ensures individuals can exercise their right to access personal data held about them.

2. Scope

This policy applies to all employees, contractors, and third-party processors who manage or process personal data on behalf of Rustington Parish Council.

3. Receiving a SAR

- SARs may be submitted verbally or in writing, including via email or social media
- Requests do not need to mention "Subject Access Request" explicitly to be valid
- All SARs must be forwarded to the Data Protection Officer (DPO) or designated compliance team immediately.

4. Verification of Identity

- Before processing, we may request proof of identity to ensure the requester is the data subject
- Acceptable forms include a passport, driving licence, or other official documentation.

5. Clarification and "Stop the Clock"

- If the request is unclear or too broad, we will:
 - Contact the requester to clarify or refine the scope
 - Pause the response deadline ("stop the clock") until sufficient information is received
- The one-month response period resumes once clarification is provided.

6. Response Timeframe

- We will respond within one calendar month of receiving a valid request
- This may be extended by up to two months for complex or multiple requests, with notification to the requester.

7. Scope of Search

- Searches will be reasonable and proportionate, as codified under DUAA
- We will identify systems likely to contain relevant personal data and avoid excessive or irrelevant searches.

8. Information Provided

We will provide:

- Confirmation that personal data is being processed
- A copy of the personal data
- Supplementary information including:
 - Purpose of processing
 - Categories of personal data
 - Recipients or categories of recipients
 - Retention periods
 - Source of data (if not collected from the data subject)
 - Information about automated decision-making.

9. Exemptions

We may withhold data if:

- It includes personal data of other individuals (unless consent is given or it's reasonable to disclose)
- Disclosure would prejudice legal proceedings, law enforcement, or regulatory functions
- It includes confidential references or legally privileged information.

10. Record Keeping

- All SARs and responses will be logged and retained for audit and compliance purposes.

11. Training and Awareness

- Staff handling personal data will receive regular training on SAR procedures and DUAA compliance.

12. Review

This policy will be reviewed annually or upon significant legal changes.