



Subject Access Request Procedure (SAR)

The Town Council shall complete the following steps when processing a request for personal data (Subject Access Request or SAR) with advice from its Data Protection Officer (One West).

1. Ascertain whether the requester has a right to access the information and capacity.
2. Obtain (reasonable and proportionate) proof of identity.
3. Engage with the requester if the request needs clarifying.

Nb. only once steps 2 and 3 have been completed, can the “clock” start.

4. Make a judgement on whether the request is complex and therefore can be extended by an additional two months.
5. Acknowledge the requester providing them with:
 - a. the response time – one calendar month (as standard), an additional two months if complex; and
 - b. details of any costs – free for standard requests, or we can charge, or refuse to process, if the request is manifestly unfounded or excessive, or further copies of duplicate information is required, the fee must be in line with the administrative cost.
6. Use its Record of Processing Activities and/or data map to identify data sources and where they are held.
7. Collect the data (the organisation may use its IT support to pull together electronic data sources such as emails and databases).
8. If (6) identifies third parties who process it, then engage with them to release the data to the Town Council.
9. Review the identified data for exemptions and redactions in line with the [ICO's Guide to the Right of Access](#) and in consultation with the organisation's Data Protection Officer (One West).
10. Create the final bundle and check to ensure all redactions have been applied.
11. Submit the final bundle to the requester in a secure manner and in the format they have requested.

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