



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 (OneWest), using the Town Council SAR Guidance provided to the Town Council.

1. Ascertain whether the requester has a right to access the information and capacity.
2. Obtain proof of identity (once this step has been completed the clock can start)
3. Engage with the requester if the request is too broad or needs clarifying
4. Make a judgement on whether the request is complex and therefore can be extended by an additional 2 months
5. Acknowledge the requester providing them with:
 - a. the response time – 1 month (as standard), an additional 2 months if complex; and
 - b. details of any costs – Free for standard requests, or you can charge, or refuse to process if the request is manifestly unfounded or excessive, or further copies of the same 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 data sources – for access to emails the organisation can do so as long as it has told staff it will do so in its policies)
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 Code of Practice on Subject Access](#) and in consultation with the organisation's Data Protection Officer (OneWest), and their Town Council SAR Guidance.
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.

Reviewed 8th August 2023