Old Woughton Parish Council
Subject Access Request Policy

Reviewed and adopted January 2026

1. Introduction

This policy sets out how Old Woughton Parish Council (henceforth referred to as "the council") will handle Subject Access Requests (SARs) in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

The Parish Council is a data controller and is committed to ensuring that personal data is processed lawfully, fairly and transparently.This policy applies to all councillors and the Clerk.

2. What is a Subject Access Request?

A Subject Access Request is a request made by an individual (the "data subject") for information about the personal data the Parish Council holds about them.

A SAR can be made:

- Verbally or in writing
- By email, letter, or social media
- By the data subject or an authorised representative

There is no requirement for a request to mention "Subject Access Request" or UK GDPR to be valid.

3. Responsibility

The Clerk is the Parish Council's responsible officer for handling Subject Access Requests.

All councillors must:

- Forward any request that may be a SAR to the Clerk immediately
- Not respond directly to the requester unless instructed by the Clerk
- Not delete, amend, or conceal any information relating to a request

4. Making a Subject Access Request

Requests should be made to:

The Clerk
clerk@oldwoughton.org.uk

Old Woughton Parish Council
PO Box 6548
Milton Keynes
MK10 1AB

However, requests received by any councillor will be treated as valid and processed accordingly.

5. Timescales

The Parish Council will respond to a Subject Access Request within one month of receipt.

The response period may be extended by up to two further months if the request is complex or numerous. If an extension is required, the requester will be informed within one month of receipt, with reasons provided.

6. Identity Verification

Before releasing personal data, the Clerk will take reasonable steps to verify the identity of the requester.If additional information is required to confirm identity, the response time will begin once satisfactory identification has been received.

7. Information Provided

The Parish Council will provide:

- Confirmation that personal data is being processed
- A copy of the personal data held about the requester
- Information about:
    - The purposes of processing
    - The categories of personal data
    - Recipients or categories of recipients
    - Retention periods
    - The requester's rights

Information will normally be provided electronically unless otherwise requested.

8. Exemptions and Redactions

Some information may be withheld or redacted where permitted by law, including where:

- Disclosure would identify another individual
- Legal privilege applies
- An exemption under the Data Protection Act 2018 applies

Any exemptions relied upon will be explained to the requester.

9. Fees

Subject Access Requests are normally provided free of charge. A reasonable fee may be charged where a request is manifestly unfounded or excessive, or for additional copies of the same information.

10. Refusal of Requests

The Parish Council may refuse to comply with a request if it is manifestly unfounded or excessive. Any refusal will be explained in writing, including the requester's right to complain to the Information Commissioner's Office (ICO).

11. Records

The Clerk will keep a record of:

- Subject Access Requests received
- Actions taken
- Dates of responses

This will assist the Parish Council in demonstrating compliance.

12. Complaints

If a requester is dissatisfied with the response, they may complain to:

Information Commissioner's Office (ICO)
www.ico.org.uk
0303 123 1113

13. Review

This policy will be reviewed by the Parish Council every four years or earlier if required by changes in legislation or guidance.

Review History

April 2019	New policy adopted – Information and Subject Access Request policy
July 2020	No changes
January 2025	Policy reviewed and items taken out that are included elsewhere, name change to Subject Access Request Policy.