Dymock Parish Council

Subject Access Policy

This policy was adopted by Dymock Parish Council in order to comply with the requirements of the General Data Protection Regulations (GDPR), in force on 25 May 2018

Data subjects have the right to access personal data held on them by the Parish Council. Details are set out in the Privacy Notice on the Council's website.

This policy is in place to ensure that internal procedures on handling of Subject Access Requests (SAR) are accurate and complied with and includes:

(1) Responsibilities (who, what)

(2) Timing

(3) Changes to data

(4) Handling requests for rectification, erasure or restriction of processing.

The Council will ensure that personal data is easily accessible at all times in order to ensure a timely response to SARs and that personal data on specific data subjects can be easily filtered.

The Council has implemented standards on responding to SARs.

1. Upon receipt of a SAR

(a) The data subject will be informed who at the Council to contact, the Data Controller.

(b) The identity of the data subject will be verified and if needed, any further evidence on the identity of the data subject may be requested.

(c) The access request will be verified; is it sufficiently substantiated? Is it clear to the data controller what personal data is requested? If not additional information will be requested.

(d) Requests will be verified as to them being unfounded or excessive (in particular because of their repetitive character); if so, the Council may refuse to act on the request or charge a reasonable fee.

(e) Receipt of the SAR will be promptly acknowledged and the data subject will be informed of any costs involved in the processing of the SAR.

(f) Whether the Council processes the data requested will be verified. If the Council does not process any data, the data subject will be informed accordingly. At all times the internal SAR policy will be followed and progress may be monitored.

(g) Data will not be changed as a result of the SAR. Routine changes as part of the processing activities concerned may be permitted.

(h) The data requested will be verified to establish if it involves data on other data subjects. This data will be filtered before the requested data is supplied to the data subject; if data cannot be filtered, other data subjects will be contacted to give consent to the supply of their data as part of the SAR.

2. Responding to a SAR

(a) The Council will respond to a SAR within one month after receipt of the request:

(i) If more time is needed to respond to complex requests, an extension of another two months is permissible, and this will be communicated to the data subject in a timely manner within the first month;

(ii) if the council cannot provide the information requested, it will inform the data subject on this decision without delay and at the latest within one month of receipt of the request.

(b) If a SAR is submitted in electronic form, any personal data will be preferably provided by electronic means as well.

(c) If data on the data subject is processed, the Council will ensure as a minimum the following information in the SAR response:

(i) the purposes of the processing;

(ii) the categories of personal data concerned;

(iii) the recipients or categories of recipients to whom personal data has been or will be disclosed, in particular in third countries or international organisations, including any appropriate safeguards for transfer of data, such as Binding Corporate Rules or EU model clauses

(iv) where possible, the envisaged period for which personal data will be stored, or, if not possible, the criteria used to determine that period;

(v) the existence of the right to request rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;

(vi) the right to lodge a complaint with the Information Commissioners Office ("ICO");

(vii) if the data has not been collected from the data subject: the source of such data;

(viii) the existence of any automated decision-making, including profiling and any meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

(d) Provide a copy of the personal data undergoing processing.

Adopted

To be Reviewed Annually

Subject Access Request Form

1. Details of the person making the request	
Title:	
First name(s):	
Surname:	
Any other names you have been known by:	
Date of Birth:	
Address:	
Daytime tel no:	
Email address:	

2. Are you requesting information about yourself?	
If YES	**Please go to section 4.**
If NO	If you are making the request on behalf of another person you must enclose with the request a signed authority from them to do so. If you are making the application because the data subject lacks capacity to make the application in their own right please outline your authority to make the application in their stead (for example, Power of Attorney). You should enclose a copy of any evidence that you may have of that authority. The Parish Council will contact you if further evidence is required. (please complete section 3)

3. Details of the Data Subject (if requesting information on behalf of someone else)	
Title	
First name(s):	
Surname:	
Date of Birth:	
Address:	
Daytime tel no:	
Email address:	
Relationship to Data Subject:	

4. Describe the information you are requesting.
If you are only seeking certain records, it would be helpful for us to know which types of record you are seeking, any time period to cover, and if you would like to see only specific document (s). Please describe these below with as much detail as you can.

Declaration:
I certify that the information given on this form is true and correct.

Signed: Date:

Return Address:
The Parish Clerk
Dymock Parish Council
3 Brook Farm Court
Little Marcle
Ledbury
Herefordshire
HR8 2JY

If as a result of the response to your request you are dissatisfied with the way we are using your personal information you should raise the matter with the Parish Clerk who can be contacted via the address above. We will do everything we can to put the matter right if the Parish Council has not processed your data correctly. You also have a right to make a complaint about our handling of your personal data to the Information Commissioner's Office, whose web site is https://ico.org.uk/

We only use the information that you provide for us to process your request. We may need to share that you have made a request with other organisations if we hold information about you that they have supplied and we need to consult with those organisations regarding release of the information to you. Records of requests will be kept for 6 years after the closure of the request for operational, statistical and audit purposes.