



HORSMONDEN PARISH COUNCIL

SUBJECT ACCESS REQUEST POLICY

(Reviewed and agreed by Horsmonden Parish Council on 1 September 2025)

1. Scope

All personal data processed by Horsmonden Parish Council is within the scope of this procedure. This procedure excludes personal data that is asked for as a matter of routine by data subjects

Data subjects are entitled to ask

- Whether Horsmonden Parish Council is processing any personal data about that individual and, if so, to be given:
 - a description of the personal data;
 - the purposes for which it is being processed; and,
 - details of who will be allowed to see the personal data.
- To be given a copy of the information and to be told about the sources from which Horsmonden Parish Council derived the information; and
- Where appropriate, logic involved in any automated decisions relating to them.

2. Responsibilities

The Data Lead is the Clerk and is responsible for the application and effective working of this procedure, and for reporting Subject Access Requests (SARs).

The Data Lead is responsible for handling all SARs.

3. Procedure

- 3.1 Subject Access Requests can be made verbally, in writing or by email
- 3.2 The data subject must provide evidence as to identity.
- 3.3 The data subject must identify the data that is being requested and where it is being held and this information must be shown on the SAR application form. Note that the data subject is entitled to ask for all data that Horsmonden Parish Council holds, without specifying that data.
- 3.4 The date by which the identification checks, and the specification of the data sought must be recorded; Horsmonden Parish Council has one month from this date to provide the requested information. Should

there be complex reasons to access the data; the council has the ability to utilise an extra 60-day extension period & must notify the data subject of the extra time required.

Collection will entail either:

- 3.4.1 Collecting the data specified by the data subject, or
- 3.4.2 Searching all databases and all relevant filing systems within Horsmonden Parish Council, including all back up and archived files, whether computerised or manual, and including all e-mail folders and archives. The Data Lead maintains a data map that identifies where all data in Horsmonden Parish Council is stored.
- 3.5 The Data Lead maintains a record of requests for data and of its receipt, including dates. Note that data **may not** be altered or destroyed in order to avoid disclosing it. This is a criminal offence under the Data Protection Act 2018.
- 3.6 The Data Lead in collaboration with the DPO is responsible for reviewing all provided documents to identify whether any third parties are identified in it and for either excising identifying third party information from the documentation or obtaining written consent from the third party for their identity to be revealed.
- 3.7 If the requested data falls under one of the following exemptions, it does not have to be provided:
 - 3.7.1 Crime prevention and detection. (Covered under S 2.1.2 Data Protection Act)
 - 3.7.2 Negotiations with the requester.
 - 3.7.3 Management forecasts.
 - 3.7.4 Confidential references given by Horsmonden Parish Council (not ones given to Horsmonden Parish Council).
 - 3.7.5 Information used for research, historical or statistical purposes.
 - 3.7.6 Information covered by legal professional privilege.
- 3.8 The information is provided to the data subject in electronic format unless otherwise requested and all the items provided are listed on a schedule that shows the data subject's name and the date on which the information is delivered.
- 3.9 The electronic formats used for responses to SARs are:
 - 3.9.1 PDF/Secure Doc/CSV formats