

Yateley Town Council

Subject Access Request (SAR) Policy

Version 8 – February 2026

1. Introduction

This policy sets out the Council's responsibilities when responding to Subject Access Requests (SARs) under UK GDPR, the Data Protection Act 2018 and the Data (Use and Access) Act 2025. The purpose of this policy is to ensure SARs are dealt with lawfully, promptly and in line with current ICO guidance.

2. What the Council MUST do

- MUST forward any SAR received to the Clerk immediately.
- MUST verify the identity of the requester before releasing personal data.
- MUST clarify unclear requests before responding.
- MUST carry out a reasonable and proportionate search for relevant data.
- MUST respond within one month of receiving a valid request (extensions permitted for complex requests).
- MUST not alter or delete data because a SAR has been received.
- MUST redact or remove third-party data unless lawful to disclose.
- MUST keep an internal log of all SARs received and actions taken.

3. How to Make a Request

SARs may be made in any written format, including letter, email, website contact form or social media message. The requester must provide sufficient detail to identify the information sought.

4. How the Council Will Process a Request

- Acknowledge receipt of the SAR.
- Verify the requester's identity.
- Request clarification if the SAR is unclear.
- Conduct a reasonable and proportionate search for information.
- Assess whether any exemptions apply.
- Prepare and issue the response within statutory deadlines.

5. Identity Verification

The Council will request proportionate ID before disclosing personal data. Acceptable documents include:

- Passport (identity)
- UK Driving Licence (identity)
- Council Tax bill (address)
- Bank/building society statement (3 months)
- Utility bill (3 months)

6. Fees

- SARs are normally free of charge.
- A reasonable fee may be charged where requests are manifestly unfounded or excessive.
- A fee may be charged for additional copies of previously supplied information.

7. Time Limits

The Council will respond within one month of receiving a valid request. Extensions of up to two months may be applied for complex or multiple requests, with written notice provided to the requester.

8. Withholding or Redacting Information

- Disclosure may be refused if an exemption applies.
- Third-party personal data will be withheld unless lawful to disclose.
- The Council will apply the ICO's three-stage test for mixed personal data.

9. Record-Keeping

The Council will maintain a log of all SARs including dates received, identity verification, searches undertaken, decisions made, deadlines applied and date of response.

10. Complaints Procedure

If a requester is dissatisfied with the handling of their SAR, they must follow the Council's Complaints Procedure. If still dissatisfied, they may complain to the Information Commissioner's Office (ICO).

11. Review of the Policy

This policy will be reviewed annually or earlier if required by changes to legislation or ICO guidance.

Amendment Record

Version	Date	Notes
1–7	2018–2024	Previous versions
8	February 2026	Rewritten to align with NALC structure; incorporates DUAA 2025 and latest ICO guidance.