



## **BATTISFORD PARISH COUNCIL**

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### **FREEDOM OF INFORMATION SUBJECT ACCESS REQUEST POLICY**

1. Upon receipt of a Freedom of Information Subject Access Request, BATTISFORD PARISH COUNCIL (BPC) WILL:

(a) Verify whether BPC is the controller or the processor of the data subject's personal data, BPC will inform the data subject and refer them to the controller.

(b) Verify the identity of the data subject.

(c) Verify the access request; request additional information as required.

(d) Verify whether requests are unfounded or excessive, seeking advice as necessary from the Information Commissioners Office.

(e) Promptly acknowledge receipt of the SAR and inform the data subject of any costs involved in the processing of the SAR.

(f) Verify whether BPC processes the data requested. If it does not process any data, inform the data subject. Ensure the internal SAR procedure is followed and progress can be monitored.

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

(h) Verify whether the data requested also involves data on other data subjects and ensure this data is filtered before the requested data is supplied to the data subject; if data cannot be filtered, ensure that other data subjects have consented to the supply of their data as part of the SAR.

### **2. RESPONDING TO A SAR**

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

(i) If more time is needed to respond to complex requests, notify the requestor maximum of three months in total is permissible

(ii) if the BPC cannot provide the information requested, it should immediately inform the data subject on this decision

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

(c) If data on the data subject is processed, make sure to include 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
  - (iv) where possible, the 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) BPC will provide a copy of the personal data undergoing processing.

Approved March 26

Review March 27