

Aynho Parish Council

Tel.: 01869 810209

Email: clerk@aynho-pc.gov.uk

Web: www.aynho-pc.gov.uk

Twitter: @aynho

Postal Address: c/o Aynho Village Hall, Croughton Road, Aynho OX17 3BD



Aynho Parish Council Subject Access Requests Policy

Aynho Parish Council recognises the rights of individuals under the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018** to access personal data held about them.

1. Council Responsibilities

Aynho Parish Council will:

1. On receipt of a Subject Access Request (SAR), forward it immediately to all relevant members or officers where appropriate.
2. Identify whether a request has been made under UK GDPR legislation.
3. Make a full and exhaustive search of the records to which the Council has access.
4. Provide all personal data that has been requested unless a lawful exemption applies.
5. Respond to a valid Subject Access Request **within one calendar month of receipt**. Where identification or clarification is required, the statutory timescale will begin once this information has been received.
6. Undertake this work **free of charge** to the requestor unless legislation permits a reasonable fee to be charged.
7. Ensure that staff are aware of and follow this guidance.
8. Where a requestor is not satisfied with a response to a SAR, manage this as a complaint in accordance with the Council's complaints procedure.
9. The Council may **refuse to comply with a request or charge a reasonable fee** where a request is manifestly unfounded or excessive in accordance with UK GDPR.

2. Handling Subject Access Requests

In order to deliver a SAR, the Council will:

a. Valid Requests

The Council will accept **Subject Access Requests made verbally or in writing**. Where a request is made verbally, the Council will record the request and confirm the details with the requester.

Where a data subject is asking for sufficiently well-defined personal data held by the Council relating to them, the Council may clarify with the requestor what personal data is required.

The requestor must provide:

- their **address**, and
- **valid evidence to prove their identity** where necessary.

b. Acceptable Identification

The Council accepts the following forms of identification.

Documents dated within the past 12 months

- Current UK/EEA Passport
- UK Photocard Driving Licence (Full or Provisional)
- Firearms Licence / Shotgun Certificate
- EEA National Identity Card
- Full UK Paper Driving Licence
- State Benefits Entitlement Document
- State Pension Entitlement Document
- HMRC Tax Credit Document
- Local Authority Benefit Document
- State or Local Authority Educational Grant Document

Documents dated within the past 3 months

- HMRC Tax Notification Document
- Disabled Driver's Pass
- Financial statement issued by a bank, building society or credit card company
- Judiciary document such as a Notice of Hearing, Summons or Court Order
- Utility bill for supply of gas, electricity, water or telephone landline
- Most recent mortgage statement
- Most recent Council Tax bill, demand or statement
- Tenancy agreement
- Building society passbook showing a transaction in the last three months and the requestor's address

c. Searching for Personal Data

Depending on how personal data is organised and stored, the Clerk may need to search:

- Emails (including archived emails and those that have been deleted but are still recoverable)

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- Word documents
- Spreadsheets
- Databases and systems
- Removable media (for example memory sticks, CDs)
- Audio recordings
- Paper records in relevant filing systems

This includes records the Clerk is responsible for or that are owned by the Council.

d. Providing the Information

The Council will not withhold personal data simply because it believes it may be misunderstood. Where appropriate, it will provide explanations alongside the personal data.

Personal data will be provided in an “**intelligible form**”, including explanations of any:

- codes
- acronyms
- complex terms

The personal data will normally be supplied in a **permanent form**, except where:

- the requester agrees otherwise, or
- providing the information would involve disproportionate effort.

Where appropriate, the Council may offer the requester the option to:

- view the personal data on screen, or
- inspect files at the Parish Office.

Any **exempt personal data** will be redacted, and the Council will explain why that information has been withheld.

e. Publication

The Council will publish this policy on the **official website**.

f. Working Practices

The Council will establish and maintain **appropriate day-to-day working practices** to support compliance with Subject Access Requests.

g. Monitoring

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A record will be maintained allowing the Council to report on:

- the **volume of requests received**, and
- **compliance with the statutory response timescale.**

h. Complaints

When responding to a complaint, the Council will advise the requestor that they may complain to the **Information Commissioner's Office (ICO)** if they remain dissatisfied with the outcome.

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Next Review: April 2028

| Version number | Purpose/change | Author | Date |
|----------------|----------------|------------|----------|
| 0.1 | Draft | Alan Youel | 27/03/26 |
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