



Subject Access Request Policy

Version: 4.7

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1. Policy Summary

The data protection legislation provides Data Subjects with certain rights, one of which enables Data Subjects to find out what personal data is held about them, why it is held and to whom it is disclosed. This right is commonly known as 'Subject Access' and is set out in Article 15 of the UK GDPR and Part 1 Section 3 of the DPA 2018. A data subject has the right to request any, or all information held by BCC that relates to them and the purpose for which their data has been processed.

- BCC has the responsibility to ensure that information must only be released to the correct individual by conducting verification checks and to respond to the data subject within one calendar month.
- Everyone has rights with regard to the way in which their personal data is managed. During the course of our activities we collect, store and process personal data about our citizens, service users, employees, suppliers and other third parties. We recognise that the correct and lawful treatment of this data maintains trust and confidence in the organisation and provides for successful service delivery.
- Subject Access requests can be received either verbally or in written form from a data subject or by a representative on behalf of the data subject.
- BCC is to ensure that any information that does not relate to the data subject is either withheld or redacted prior to responding to the data subject.
- BCC is to ensure that any information requested relating to a child has the sufficient checks in place to ensure that child (where age appropriate) is aware of the request and that suitable checks on the validity of the requester to obtain the information about the child is valid.
- BCC is to ensure that any information requested by a third party is validated to ensure that they are acting on behalf of the data subject via signed documentation by the data subject or letters of administration (Power of Attorney).
- All Subject Access Requests must be managed and responded to using iCasework and once the response has been sent to the data subject that the case is closed on iCasework to provide a true understanding of our response times versus the legal requirement.
- Employees of BCC are obliged to comply with this policy when processing personal data on our behalf. Any breach of this policy may result in disciplinary action.

A copy of the full Subject Access Request policy is available on request.

2 Definitions

2.1 Data Subject – The Data Subject is the living individual to whom the data requested in the SAR relates.

2.2 iCasework – The case management software used by BCC to manage SARs.

2.3 Personal data - Personal data means any information relating to an identifiable person who can be directly or indirectly identified from it. This can include an IP address or other online identifier as well as the more obvious name, address etc. More information about what constitutes personal data can be found on the ICO website - [What is personal data? | ICO](#)

2.4 Subject Access Request (SAR) – A request made by or on behalf of a Data Subject to obtain their personal data as processed by BCC.

2.5 Confidential Information - Information provided in confidence by an individual, that they would expect to not be shared further without their consent or a suitable exemption. This includes medical information, demographic information, and information about 3rd Parties.

2. Standards

[UK General Data Protection Regulation \(UKGDPR\)](#)

[Data Protection Act 2018 \(DPA 2018\)](#)

3. Version Awareness:

Please note that documents printed or downloaded are uncontrolled documents and therefore may not be the latest version.

Ensure this is the latest version by checking [Privacy \(bristol.gov.uk\)](https://www.bristol.gov.uk/privacy)

Title:	Subject Access Request Policy
Description:	Policy for responding to Subject Access Requests (SAR) from data subjects who wish to access their information as held by BCC
Author:	Data Protection Officer
Scope:	All members of staff, or third-party providers of services or support
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Security Standard and Clauses	
ISO27001:2013 requirements: A.8.1.3, A.13.2.3 and A.18.1.4	

SUBJECT ACCESS REQUEST POLICY – VERSION 4.7

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3.0	29/03/2018	Document created
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4.1	29/01/2020	Review and revision
4.2	07/02/2020	Review and revision
4.3	03/06/2020	Review and revision
4.4	16/06/2020	Review and revision
4.5	07/03/2022	Review and revision – accessibility adjustment
4.6	13/03/2023	Review and revision
4.7	19/07/2023	Review and revision