



MINUTES OF THE SUBJECT ACCESS REQUEST COMMITTEE MEETING
HELD AT 9.00AM ON WEDNESDAY 06 AUGUST 2025
IN THE COUNCIL CHAMBER

Councillors

Cllr D Nicholas

Cllr M Scully*

Cllr E Townsend

Cllr R Tyler*

Cllr C Walker* (Chairman of the Committee)

PRESENT*

ALSO PRESENT: Parish Clerk B. Bell.

CHAIRMAN OF THE COMMITTEE

Cllr R Tyler nominated Cllr C Walker to Chair the Committee, was seconded by Cllr M Scully and AGREED. Cllr C Walker took the chair.

1. APOLOGIES FOR ABSENCE

The Council AGREED the prior commitment apology of Cllr D Nicholas.

2. DECLARATIONS OF INTEREST

There were no declarations of interest.

3. PUBLIC SESSION

There were no members of the public present.

4. SUBJECT ACCESS REQUEST

The Council considered this agenda item in private and confidential session: reason – GDPR in confidence.

The Parish Council received a Subject Access Request on 18 July 2025 for CCTV footage from 11 cameras running 24 hours a day for 28 days. The Council had asked the data subject to be more specific, but they re-affirmed their request for every camera for 28 days.

The Clerk investigated the request through the Council's CCTV contractor who advised that the Parish Council would need to purchase additional equipment for the size of data required and it would take a member of their staff approximately four days to download the footage. The Clerk calculated a total of 7,392 hours of footage would need to be viewed to search for the data subject from the photograph on their driving licence. This would take 31 members of staff working 8 hours a day for the whole subject access period of 30 days to view the footage and may require facial recognition software which the Parish Council does not own. The Parish Council also does not have 31 members of staff. Once the data subject has been identified, the Parish Council would then need to engage a contractor to redact any third parties in the footage in accordance with UK-GDPR.

The Parish Council consulted with their Data Protection Officer. He advised that the Council has undertaken a reasonable and proportionate search for the personal data as per the UK GDPR (clarified by the Data Use and Access Act 2025), and said organisations are not required to comply with a SAR where doing so would involve a disproportionate effort.

The Committee AGREED to refuse the Subject Access Request referring to the ICO website as it is manifestly unfounded because the request is malicious in intent and is being used to harass an organisation with no real purpose other than to cause disruption:

- It would require the purchase of additional equipment to download the footage for 11 cameras, 24 hours per day for 28 days.
- It would require the purchase of external resource to download the footage, estimated at four days of contractor time.
- It would require 924 hours of staff time to view the footage from 11 cameras, 24 hours per day for 28 days. The request would require 31 members of staff working 8 hours per day for 30 days to comply with the request. It is setting the Council up to fail to meet the request as it has insufficient staff to complete the request within one month.
- It would require facial recognition software to identify the data subject from their driving licence image as they have declined to be more specific with their data subject request.
- It would require the purchase of external resource to redact third parties in any footage containing the data subject.

For these reasons the Subject Access Request is refused and the Council considers the matter closed.

The Council will notify the data subject that they have the right to make a complaint to the ICO and the ability to seek enforcement through the courts.

The meeting closed at 9.30am.

Signature.....

Date.....