



MINUTES OF THE SUBJECT ACCESS REQUEST COMMITTEE MEETING
HELD AT 6.00PM ON TUESDAY 26 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.

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.

On 06 August 2025, the Committee had AGREED to refuse the Subject Access Request of 18 July 2025 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.

The Data Subject was notified of the refusal and that the Council considered the matter closed, but notified 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 Council also offered to meet with the Data Subject on an informal basis to listen to their concerns, the Data Subject rejected this offer and said they would prefer to resolve this matter through formal channels, where clarity and transparency are ensured.

The Data Subject responded on the same day with a request to preserve all data for their complaint already submitted to the ICO. Advice was sought from the Council's Data Protection Officer who advised that it is a criminal offence to delete data under investigation by the ICO. Due to the size of the Data Subject Request, the entire NVR was disconnected and a replacement ordered at a cost of £1,465.07 + VAT. The Data Subject was notified on 11 August 2025 that the data had been preserved.

On 13 August 2025 the Data Subject requested all data relating to third parties is preserved, advice was sought from the Council's Data Protection Officer and the Data Subject was advised that they are not entitled to access data relating to third parties.

On 15 August 2025, the Data Subject sent four emails to the Council:

- An email disputing payment for hire periods which they had cancelled and requesting a copy of their hire agreement.
- A second request to preserve all data relating to third parties.
- A second Subject Access Request relating to specific times within the original request.
- A notice before court action requesting financial compensation.

The Clerk sought of the advice of the Council's Data Protection Officer who had a long conversation with the ICO regarding the four communications of 15 August 2025. The ICO advised that as the Data Subject has requested a financial settlement, the Subject Access Request should be refused again as manifestly unfounded and vexatious.

The Data Subject was again invited to attend the Subject Access Request Committee meeting either in person or via zoom but did not reply to the invitation.

The Committee considered the advice of the Council's Data Protection Officer and the ICO and AGREED to refuse the second Subject Access Request as it is manifestly unfounded and vexatious as financial compensation had been requested.

The Committee again offered an informal meeting with the Data Subject.

The meeting closed at 6.39pm.

Signature.....

Date.....