



MINUTES OF THE SUBJECT ACCESS REQUEST COMMITTEE MEETING
HELD AT 12.00PM ON MONDAY 07 SEPTEMBER 2026
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 E Townsend.

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 Council received a Subject Access Request on 18 July 2025. The Council responded to the request on 21 July 2025 seeking clarification given the breadth of the original request and stopped the clock in accordance with the ICO Stop the Clock Guidance. The Data Subject provided clarification on 11 August 2026 and narrowed the request for the CCTV footage by date, time and camera/location. For each of those dates, the Data Subject requests footage containing their personal data from the following cameras and periods:

Main hall camera: approximately 9:30am to 5:00pm.

Corridor/entrance camera: approximately 9:00am to 10:00am and 4:00pm to 6:00pm.

Coffee-shop area camera: approximately 9:00am to 10:00am and 4:00pm to 6:00pm, insofar as they appear within its field of view when arriving at or leaving the premises.

The Data Subject requested a reasonable margin around those times to account for variations in their precise arrival/departure time and any difference in the CCTV system clock.

The Council re-started the clock and AGREED that it has until 09 September 2026 to respond to the Subject Access Request for four of the specified dates, but the fifth date relates to a new Subject Access Request for which the Council has until 11 September 2026 to respond to the new Subject Access Request.

The Council considered the original Subject Access Request and second Subject Access Request together. The Council has sought the advice of their solicitor in formulating its decision.

The Council's position remains that the request is substantial, that it cannot identify the Data Subject within the footage without engaging a third-party contractor and that any footage disclosed would require review and redaction because it contains footage of third parties, including children.

The ICO guidance states that the assessment of whether a request is excessive requires consideration of all the circumstances, including:

- the nature of the information requested;
- the proportionality of the burden and cost of compliance;
- the context of the request and the relationship between the parties;
- the resources available to the controller;
- whether the request repeats or overlaps with previous requests; and
- whether the information has already been provided by another route.

Applying those factors here, the information sought is CCTV footage which may contain footage of the Data Subject. The Data Subject will know exactly why they were at the hall and what they were doing there. The request still covers approximately 70 hours of footage. Reviewing that footage would require around 10 working days, equivalent to two weeks of full-time work, before taking account of the further time and cost of engaging a third-party contractor to identify the Data Subject and redact footage containing the personal data of third parties. This is a significant burden and the cost of this exercise would potentially be significant. The Council has limited resources. The material has not already been provided by another route.

In the light of the above, the Council considers that the original request remains excessive and it is refused and the new Subject Access Request is also excessive and is refused.

In relation to the Data Subject's query regarding audio, a Subject Access Request entitles an individual to their personal data. It does not give an individual a general right to obtain technical information about a CCTV system. In the circumstances the Council considers that the Data Subject is not entitled to the configuration records.

The meeting closed at 12.15pm.

Signature.....

Date.....