

**DATA PROTECTION ACT 2018
(PART 6, SECTION 149)**

ENFORCEMENT POWERS OF THE INFORMATION COMMISSIONER

ENFORCEMENT NOTICE

DATED: 27 August 2025

To: Bristol City Council

OF: City Hall
PO Box 3399
Bristol
BS1 9NE

I. INTRODUCTION AND SUMMARY

1. Bristol City Council ("**BCC**") is a "controller" as variously defined in sections 3(6), 5 and 6 of the Data Protection Act 2018 ("**DPA 2018**") and Article 4(7) of the UK General Data Protection Regulation ("**UK GDPR**").¹
2. The Information Commissioner (the "**Commissioner**") issues this Enforcement Notice ("**Notice**") to BCC under section 149(2)(b) DPA 2018. The Notice is in relation to contraventions of Articles 12(3), 15(1) and 15(3) UK GDPR.

¹ Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, as it forms part of the law of England and Wales, Scotland and Northern Ireland by virtue of section 3 of the European Union (Withdrawal) Act 2018. For the period 25 May 2018 to 31 December 2020, references in this Penalty Notice to the UK GDPR should be read as references to the GDPR (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data) as it applied in the UK during that period.

3. This Notice explains the Commissioner's decision. The steps that BCC is required to take are set out in Annex 1.
4. The Commissioner has previously served BCC with a Preliminary Enforcement Notice (the "**PEN**") dated 9 June 2025. BCC provided written representations (the "**Representations**") in response to the PEN on 30 June 2025. The Commissioner has taken the Representations into account when deciding to issue this Notice and refers to the Representations below when appropriate.

II. LEGAL FRAMEWORK

5. Section 149(1) DPA 2018 provides that, if the Commissioner is satisfied that a person has failed, or is failing, as described in section 149(2) DPA 2018, the Commissioner may, by written notice (an enforcement notice), require that person to take steps or refrain from taking steps specified in the enforcement notice.
6. The types of failure described in section 149(2) DPA 2018 include *"where a controller or processor has failed, or is failing, to comply with ... (b) a provision of Articles 12 to 22 of the UK GDPR ..."*
7. Section 150 DPA 2018 provides that:

"(1) An enforcement notice must –
 - (a) "state what the person has failed or is failing to do",*
and
 - (b) "give the Commissioner's reasons for reaching that opinion".*
8. Article 12(3) of the UK GDPR requires that controllers *"shall provide information on action taken on a request under Articles 15 to 22 to the data subject without undue delay and in any event within one*

month of receipt of the request”, adding that this period “may be extended by two further months where necessary, taking into account the complexity and number of the requests. The controller shall inform the data subject of any such extension within one month of receipt of the request, together with the reasons for the delay”.

9. The information a data subject is entitled to be provided with under Article 15(1) of the UK GDPR is *“confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:*

- the purposes of the processing;*
- the categories of personal data concerned;*
- the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;*
- where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;*
- the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;*
- the right to lodge a complaint with the Commissioner;*
- where the personal data are not collected from the data subject, any available information as to their source;*
- the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) and, at least in those cases, meaningful information about the logic involved,*

as well as the significance and the envisaged consequences of such processing for the data subject.”

10. Article 15(3) provides that controllers “*shall provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form*”.

III. FACTUAL BACKGROUND

11. BCC is the local authority for the city of Bristol in the Southwest of England. The city is the eighth largest in England and Wales outside of London with an estimated population of 483,000 in mid-2023.²
12. In February 2023, the Commissioner made informal enquiries with BCC regarding their handling of subject access requests (“**SARs**”) following a number of complaints made by individuals to the Commissioner regarding BCC’s delays in responding to their SARs.
13. BCC responded to these enquiries in March 2023 to explain that they had a backlog of 170 overdue SARs,³ with the oldest dating from 3 December 2020.
14. The Commissioner continued informal engagement with BCC on a regular basis between March 2023 and March 2024 to discuss how BCC intended to resolve the backlog.

² See ‘[Population of Bristol](#)’ in the ‘Statistics and Census Information’ section of the BCC website.

³ SARs which remain outstanding after the statutory deadline for responding has expired

15. In February 2024, BCC's SAR backlog had increased to 189 outstanding cases. BCC further indicated at this time that it would take 50 months (over 3 years) to complete the SAR backlog.
16. The Commissioner had concerns regarding the extent of the backlog and BCC's plans for addressing it.
17. In light of these concerns, on 25 April 2024, the Commissioner wrote to inform BCC that a formal investigation had been opened and requested the following information:
 - statistics regarding BCC's SAR compliance from 1 April 2023 to 31 March 2024;
 - information on BCC's organisational approach to dealing with SARs; and
 - a description of the information BCC provides to data subjects about their rights of access.
18. BCC responded on 13 May 2024, providing statistics on its monthly SAR compliance rates, stating that it had received 961 SARs between 1 April 2023 and 31 March 2024, but confirmed that it had only provided a response to 400 SARs (42%) within the statutory timeframe.⁴
19. BCC also provided a copy of an action plan to improve SARs compliance (the "**Action Plan**") and stated it was based on an action plan it had created in response to its Freedom of Information request backlog as the actions overlapped.
20. In terms of BCC's organisational approach to dealing with SARs, staffing in BCC's disclosure team as of 8 May 2025 was as follows:

⁴ BCC Spreadsheet of SAR compliance 1 April 2023 – 31 March 2024

- 1 Disclosure Manager
 - 1 Disclosure Team Leader
 - 2 Lead Disclosure Officers (one to be recruited)
 - 10.3 Disclosure Officers assigned as:
 - i. 1 Full Time Equivalent (“**FTE**”) who works on the oldest cases less than 500 pages
 - ii. 7.3 FTE who work on the prioritised cases then in date order
 - iii. 2 additional FTE Disclosure Officers to be recruited.
21. In the Representations BCC confirmed that the Lead Disclosure Officer had been recruited with an anticipated start date of 30 June 2025 and recruitment had begun for two Disclosure Officers on a fixed term basis.⁵
22. BCC categorises SARs using the following priority (“**P**”) system:⁶
- P1 – urgent due to court cases/referrals from the Commissioner/multiple chasers from the customer
 - P2 – following a customer request
 - P3 – remaining SARs
23. Throughout the course of the investigation, the Commissioner has also held regular meetings with BCC to review BCC’s handling of SARs to find a solution to resolve the historic backlog.
24. BCC has also provided monthly statistics on the number of SARs ‘received’ and ‘processed’ as well as indicating the total overdue requests and date of the oldest overdue SAR. Since March 2025 BCC has provided weekly statistics on the SARs received since 2022 noting progress on these.

⁵ Paragraph 6 BCC Representations dated 30 June 2025

⁶ As explained by BCC to the ICO in a meeting dated 29 August 2024.

25. The Commissioner notes that attempts have been made by BCC to reduce the SAR backlog. In July 2024, BCC engaged an external organisation ("**the external organisation**"),⁷ to assist with tackling its current SAR backlog. The Commissioner understands that the intention was for the external organisation to process the oldest, most complex and lengthy SARs of 500 pages or more. BCC's plan was to send one case to the external organisation and once BCC was satisfied with how that SAR was handled, five would be sent each month. This figure was determined due to the size and complexity of the cases and because the contract was time based. The SARs that BCC identified as being suitable to be sent to the external organisation were some of the oldest overdue SARs dating back from 2022 with the earliest SAR dating back to 3 January 2022.
26. In a meeting between the Commissioner and BCC held on 29 August 2024, BCC revised the length of time it would take to clear the SAR backlog to be 36 months. This was based on the extra assistance BCC was receiving from the external organisation who would be processing the oldest most complex SARs.
27. On 11 March 2025, BCC informed the Commissioner that the number of SARs that had not been responded to within the statutory timeframe stood at 200. The oldest SAR at this time was made on 3 January 2022, and the delay in responding to this request was explained by BCC as being due to the complexity and length of the data as well as delays with the external organisation who were assisting with the backlog.⁸

⁷ The external organisation offers help to local government with their information governance concerns.

⁸ Meeting between BCC and the Commissioner on 11 March 2025

28. At a meeting on 11 March 2025, BCC confirmed that since 26 July 2024 the external organisation had completed only two of the SARs sent to them. Five SARs were with the external organisation and seven were prepared and held at BCC waiting to be sent to the external organisation. BCC explained to the Commissioner that the quality of the SARs completed by the external organisation did not meet its required standard, and some SARs had been returned to the external organisation by BCC for further work.
29. At the meeting on 11 March 2025, BCC also explained that it had created a document specifying its requirements and the level of detail and quality that it requires the external organisation to adhere to when completing SARs (**"the instructions document"**). The Commissioner notes that BCC engaged the external provider in July 2024, but it is not clear when instructions document was created, and it was only shared with the Commissioner in May 2025. BCC did not offer any explanation as to the length of time it had taken to agree the instructions document with the external organisation or to produce the document.
30. In the Representations, BCC state that they reported openly with the ICO during monthly meetings and described at the meeting on 11 March 2025 in some detail the instructions document prepared. The Representations do not state when the document was prepared and provided to the external organisation, which leads to the Commissioner to conclude, on balance, that the required standard was not agreed at the outset of engaging the external organisation. The lack of direction from BCC at the outset of the engagement and standard with the external organisation is likely to have led to further delays in responding to SARs requests.

31. In the Representations, BCC provided updated statistics on the current outstanding SARs. As of 30 June 2025, BCC's SAR backlog was 231, with the oldest SAR still being over three years old, significantly in excess of the statutory timeframe for response (although the Commissioner notes BCC in May 2025 indicated that it intended to fulfil this SAR within the next couple of weeks).⁹ The Commissioner understands that the majority of the delayed SARs are in relation to children's social care data.
32. In the Representations BCC provided the following updated statistics for the current overdue SARs as follows:¹⁰

Year	Number of overdue SARs
2022	1
2023	44
2024	120
2025	66

33. BCC has informed the Commissioner that it receives complex SARs which involve social care data and, in some cases, large volumes of personal data.¹¹ As a local authority it is subject to budget restrictions and has struggled at times with resourcing for handling SARs with there being only one member of staff responsible for all children's SARs for 2013-2016. BCC has explained to the Commissioner that since the COVID pandemic it has seen a significant increase in the number of SARs received. For the period of April 2023 to March 2024 BCC received 961 SARs compared to 107 for the same period two years prior, an increase of nearly 900%.¹²
34. BCC has also made the Commissioner aware of the difficulties that it has faced in terms of resourcing, with insufficient staff in place

⁹ BCC Spreadsheet of SAR compliance for April 2025, provided on 7 May 2025

¹⁰ Paragraph 5 BCC Representations dated 30 June 2025

¹¹ BCC response to ICO questions January 2024, response to question 5.

¹² BCC Spreadsheet of SAR compliance 1 April 2023 – 31 March 2024

to tackle the SAR backlog, and a number of staff requiring training in dealing with and responding to SARs and support from more experienced staff.¹³ BCC has increased staffing numbers and made the team more centralised but the backlog persists.

35. At a meeting on 29 August 2024, BCC explained to the Commissioner that it was struggling financially, and it was therefore unable to increase its staffing levels. However, at a meeting with the Commissioner on 11 March 2025, BCC confirmed it balanced the budget for this year and was hoping to get budget for extra resources in the team.
36. The Commissioner acknowledges these difficulties, however, the substantial proportion of SARs which remain outstanding, and which have not been responded to within the statutory timeframe, is a cause of significant concern. BCC has had a consistent SAR backlog since 2020. The compliance rate demonstrates that BCC has failed and is continuing to fail to comply with its obligations to data subjects, in relation to the right of access under the UK GDPR and / or DPA 2018.
37. The Commissioner received no less than 63 complaints between April 2023 – January 2025 from individuals in relation to how BCC has handled their SARs, with some expressing distress and detriment as a result of the delay in receiving a copy of their requested personal data, for example:

- [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
[REDACTED]
[REDACTED] [REDACTED]
[REDACTED]

¹³ BCC responses to further questions, provided on 22 August 2024

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

38. BCC has provided the Commissioner with complaints statistics, stating that for April 2023 to March 2024 it received a total of 13 complaints about SARs. However, at a meeting in March 2025 BCC confirmed that it had received one further complaint, and when this was discussed, BCC stated that it had also received 12 requests for “internal reviews”¹⁴ for SARs.¹⁵
39. BCC provided the Commissioner with the Action Plan which focused on reviewing staff training, resource deployment, software permissions and group forums for use by the team responsible for SARs. The Commissioner found the Action Plan to be insufficient and lacking in detail with no timeframes provided for clearing the backlog of SARs.
40. BCC stated in the Representations that this characterisation of the Action Plan was not expressed to BCC until receipt of the PEN. The Commissioner is satisfied that the Action Plan is inadequate, and this is further evidenced by the lack of progress over the past few years and lack of discernible targets to measure progress against.

¹⁴ BCC explained that internal reviews are carried out where a data subject complains after BCC has completed their SAR, for example because they believe BCC has not provided everything it is obligated to provide.

¹⁵ Meeting between the Commissioner and BCC on 11 March 2025

41. Furthermore, the Action Plan does not set out in specific detail as to how BCC intends to systematically deal with its SAR backlog, how it intends to allocate SAR cases, or set target completion dates. For example, in the section of the Action Plan entitled "*Procedural How you handle the requests you receive*" the action points are generic in nature and do not set out a step-by-step process in how to record, allocate, manage the requests with defined timescales at each stage. The Action Plan also does not set out any plans for updating individuals who have made SARs.
42. At a meeting between the Commissioner and BCC on 8 May 2025, BCC stated that there is no training material for the Disclosure Team. This conflicts with an action point in the Action Plan which is entitled "*Review training and support offer*" and is marked as high priority.
43. In the Representations, BCC states that the Commissioner's concerns regarding staff training contradicts information BCC provided verbally to the Commissioner at monthly meetings which demonstrates its commitment to training within the Disclosure Team. BCC state that new members of the team are trained by working on 'live' cases, under supervision with the benefit of the 'Safeguarding Concerns Guide', 'Social Care Consult document' and 'Disclosures Officer checklist' which acts as reference tools to aid them. BCC also state that staff have access to general guidance on the Disclosures Team SharePoint site and staff intranet. Given this explanation, the Commissioner acknowledges that training takes place within the team, however it remains the case that BCC stated at a meeting on 8 May 2025 that there were no training materials for the Disclosure Team. This contradiction has not been properly explained in the Representations.

44. Throughout this investigation the monthly SAR compliance statistics provided by BCC, which have been sent in different formats, have been confusing and contradictory. In the Representations BCC refutes this on the basis that agreeing the format and contents of the compliance statistics was an iterative process with the Commissioner. This may be the case but does not explain nor excuse the continued discrepancies. For example, on occasions when BCC has provided copies of its SAR compliance rates to the Commissioner, individually recorded SARs have disappeared from the statistics without explanation, only to appear the next month as still being overdue. For the compliance statistics provided for April 2025, the Commissioner has noted twenty such discrepancies including the addition of a new SAR which was reportedly received in November 2024 but had not featured in the compliance statistics until this latest update. Furthermore, in an email from BCC dated 29 May 2025, BCC state the number of outstanding cases for 2024 is 117, however, in the Representations, the number of outstanding cases for 2024 is listed as 120. It is not clear why there was an increase of 3 outstanding 2024 SARs cases between 29 May 2025 and 30 June 2025. The Commissioner finds the lack of certainty and consistency regarding the number of outstanding cases to be of concern.
45. The Commissioner understands that the majority of the outstanding SARs are in relation to children's data. The Commissioner is concerned that BCC's current practice of prioritising a case after contact has been made by the Commissioner or the data subject may put data subjects where there has been no intervention at a disadvantage. Additionally, BCC does not always utilise this prioritisation. For example, the Commissioner notified BCC on 31 October 2024 that one SAR

complaint received by the ICO related to court proceedings resulting in the SAR being designated as P1 by BCC. However, currently this SAR remains outstanding in May 2025 whilst others have been completed by BCC.

46. There has been limited progress with the external organisation instructed to assist with the SARs backlog, and the Commissioner is concerned that this will have caused further delays to those data subjects whose cases have been identified as being suitable to being processed by the external organisation.
47. In further communications with the Commissioner, BCC anticipated requiring 50 months to clear the backlog of SARs and then on 29 August 2024 revised this to 36 months due to the planned use of the external organisation. More recent correspondence from BCC in May 2025¹⁶ suggested that BCC hoped to clear the backlog by the end of 2026. Regardless of the difficulties with the external organisation, the Commissioner does not consider this to be an acceptable amount of time to clear the existing backlog.
48. BCC's approach towards compliance with its obligations under UK GDPR has been of significant concern and demonstrates a poor organisational attitude towards data subjects' rights and BCC's compliance with the law. For example, in response to a query from the Commissioner regarding SAR resourcing, BCC stated "*I would suggest it is for the ICO to advise if the council is adequately resourced*".¹⁷ Although the Commissioner understands the difficult impact under-resourcing has on organisations, this is not an issue for the Commissioner to rectify. The Commissioner is of the view that it is for organisations to demonstrate compliance with their data protection obligations and to judge what resources are

¹⁶ BCC to ICO email dated 29 May 2025

¹⁷ BCC Action Plan January 2024, see response to question 15.

appropriate for their organisation as they alone will best understand the pressures they face and the nature of their business.

IV. THE COMMISSIONER'S FINDING OF INFRINGEMENT

49. In light of the above and on consideration of the Representations, the Commissioner finds that BCC has failed and continues to fail to meet its data protection obligations in responding to SARs.
50. The Commissioner finds that BCC has infringed the following provisions of the UK GDPR:
 - a. Article 15(1), as BCC has failed to provide data subjects with confirmation as to whether or not personal data concerning them is being processed, and has failed to provide access to the personal data and to the information as set out in Article 15(1)(a) to (h).
 - b. Article 15(3), as BCC has failed to provide data subjects with a copy of the personal data undergoing processing.
 - c. Article 12(3), as BCC has failed to provide information on action taken on a request under Article 15 to data subjects without undue delay, and in any event within one month of receipt of the request.

V. ISSUE OF THE NOTICE

51. The Commissioner has considered, as he is required to under section 150(2) DPA 2018 when deciding whether to serve an

enforcement notice, whether the infringements addressed herein have caused or are likely to cause any person damage or distress. The Commissioner considers that, for at least some data subjects, distress has been caused. As detailed at paragraph 37, the Commissioner has received complaints from data subjects, some of which have experienced a detriment as a result of BCC's alleged non-compliance. Even if a failure to comply with these provisions has not caused, or is not likely to cause, any person damage or distress, the issue of this Notice to compel compliance is nonetheless an appropriate exercise of the Commissioner's enforcement powers.

52. Having regard to the specific infringements and the level of the contravention, and BCC's financial constraints and the number and complexity of SARs it receives, and BCC's Representations, the Commissioner considers that an Enforcement Notice would be a reasonable and proportionate regulatory step to bring BCC into compliance. The Commissioner notes that BCC has had a consistent SAR backlog since 2020, and despite engagement with the Commissioner since 2023, BCC has made little progress in tackling the backlog and bringing itself into compliance with the law.
53. In the Representations, BCC state that issuing an Enforcement Notice would be premature in all the circumstances and it would not be a '*proportionate step to ensure regulatory compliance*'. BCC states that it has made tangible progress with the 2022 cases and progress has also been made on the 2023 cases with 11 cases having been closed. BCC expressed disappointment that the Commissioner is not taking a collaborative approach and is instead considering Enforcement Action.

54. However, the Commissioner has been engaging with BCC since March 2023 and limited progress has been made with the SARs backlog over this period. The Commissioner considers that given the consistent backlog and repeated deadline fluctuations, the issuing of this Enforcement notice is a proportionate and necessary measure to focus BCC's mind to the task at hand and avoid any further delays in responding to the SAR backlog.
55. The Commissioner notes that the Representations make no specific submissions regarding the proposed timescales set out in Annex 1 of the PEN. The Commissioner is of the view that the enforcement terms and timescales set out in the PEN are reasonable and proportionate. The significant delays in dealing with the SARs requests is likely to have caused difficulties for data subjects who required their personal data and it is vital that BCC takes appropriate steps to bring itself into compliance with UK GDPR.
56. The Commissioner considers the terms of this Enforcement Notice to be effective in remedying the infringements as the terms set out clear, defined and realistic timescales for BCC to address the outstanding backlog of SARs and remedy the infringements. Given the pragmatic and defined nature of the enforcement terms, the Commissioner considers that the requirements of this Notice are no more onerous than is needed to achieve that aim and do not cause disadvantages which are disproportionate to the aim taking into account the purpose of the UK GDPR.
57. BCC is required to take the steps set out in Annex 1.
58. If a person fails to comply with an Enforcement Notice, the Commissioner may serve a penalty notice on that person under section 155(1)(b) DPA 2018, requiring payment of an amount up

to £17,500,00 or 4% of an undertaking's total annual worldwide turnover, whichever is the higher.

VI. APPEAL


59. BCC is entitled to appeal against this Enforcement Notice to the First-tier Tribunal (Information Rights) by virtue of Section 162(1)(c) DPA 2018. If an appeal is brought against this Enforcement Notice, the Enforcement Notice need not be complied with pending determination or withdrawal of that appeal.

60. Information about the appeals process may be obtained from:

General Regulatory Chamber
HM Courts & Tribunals Service
PO Box 9300
Leicester LE1 8DJ
Telephone: 0203 936 8963
Email: grc@justice.gov.uk

61. Any Notice of Appeal should be served on the First-tier Tribunal within 28 calendar days of the date on which this Enforcement Notice is sent.

Dated: 27 August 2025

Signed:.....

Sally Anne Poole

Head of Investigations

Information Commissioner's Office

Wycliffe House

NON-CONFIDENTIAL – FOR PUBLICATION

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SK9 5AF

ANNEX 1

TERMS OF THE ENFORCEMENT NOTICE

BCC is required:

1. To contact all data subjects with overdue SARs referred to in the table at paragraph 32 of this Enforcement Notice to notify them of the delay in actioning their request;
2. To provide the data subjects who have outstanding SARs referred to in the table at paragraph 32 of this Enforcement Notice with confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, provide these data subjects with a copy of their personal data and the information as set out in Article 15(1)(a)-(h) (for SARs under the UK GDPR) subject only to the proper application of any exemption from, or restriction of the right of subject access provided by the UK GDPR or DPA 2018.
3. In relation to term 2 above, the data subjects referred to in paragraph 32 of this Enforcement Notice must be provided with the information required at 2(a) and 2(b) by the following dates:
 - a. By 30 days from the date of this notice for data subject(s) who have outstanding SARs from 2022;
 - b. By 90 days from the date of this notice for the data subjects who have outstanding SARs from 2023;
 - c. By 7 calendar months for the data subjects who have outstanding SARs from 2024;
 - d. By 8 calendar months for the data subjects who have outstanding SARs from 2025.

4. To provide the Commissioner with formal progress updates in writing regarding enforcement terms 1, 2 and 3, and the number of outstanding SARs resolved, at weekly intervals until all SARs listed in the table in paragraph 32 of this Enforcement Notice have been completed.
5. By 90 days from date of this notice to have created an action plan designed specifically to tackle the remaining backlog of SARs and shared this with the Commissioner. The action plan should set out responsibilities for SAR compliance, how SARs are prioritised, logged and assigned amongst BCC's disclosure team and any external organisations, and timelines for completing both existing SARs and managing new SARs BCC receives, considering any additional improvements that can be made to the SARs handling process, as well as any other action points relevant to the handling, management and completion of all SARs requests (both outstanding and new).
6. By 12 months from the date of this notice to have carried out such changes to its internal systems, procedures and policies as are necessary to ensure that future SARs received by BCC, are identified and complied with in accordance with Articles 12 and 15 UK GDPR. Such changes may include:
 - a. Ensuring that the subject access disclosure team at BCC has the required staff and resources to provide SAR responses within the legislated timeframe.
 - b. Ensuring staff have adequate training in place to process and respond to SARs, in line with Articles 12 and 15 UK GDPR.