

Dumfries and Galloway Council

Date 26/06/2026

Data Protection Officer
Dumfries And Galloway Council
Council Headquarters
English Street
Dumfries
DG1 2DD

Our Ref: DSAR-20260626-EA8F19

Client Ref: 100278

Subject: Data Subject Access Request under Article 15 UK GDPR and Section 45 DPA 2018 - Our
Reference: 100278

Client Name: Mr George Harkness

Client Address: 107 Main Street , Muirkirk , KA18 3QS

Client Reference: 100278

Date of Birth: 17/07/1958

Name in Care:

Previous Address: 251 Glenlora Drive, Glasgow , G53

Parents Names: Mother: Margaret Smith - Father: Edward Harkness

Dear Sir/Madam,

We act on behalf of the above-named client, who was placed in residential care at the institution(s) referenced below during the approximate period stated.

Approximate Dates of Placement:

Galloway House Residential School: 1969 - 1971

This request is made under Article 15 of the UK General Data Protection Regulation and Section 45 of the Data Protection Act 2018.

Scope of Request

We request disclosure of all personal data held in relation to our client, across all systems and formats, including but not limited to:

Admission and discharge records

Full placement history, including transfers between care settings

Social work records, case files, and assessments

Daily logs, key worker notes, and case notes

Incident reports, safeguarding records, and protection referrals

Case conference notes, reviews, and internal assessments

Complaints, investigations, and outcomes

Correspondence between staff, local authorities, and external agencies

Records shared with or held by third-party care providers acting on your behalf

Medical, psychological, or educational records held within the care file

Photographs or other documentation relating to our client's time in care

Records identifying staff members and roles involved in their care

Historical and Archived Records

Given the historical nature of this request, we require that all reasonable and proportionate searches are undertaken, including:

Archived and off-site storage

Legacy systems, including paper, microfiche, and scanned records

Records held under previous authority names, reorganisations, or successor bodies

Records held by contracted, private, or voluntary sector care providers commissioned by your authority

Placement and Authority Clarification

Where records indicate placement in additional care settings, we request:

Details of those institutions

Dates of placement

The commissioning or responsible authority

This information is required to ensure a complete and accurate record of our client's time in care.

Format of Disclosure

Please provide the information in electronic format where possible. Where records exist only in non-digital formats, scanned copies will be acceptable.

Enclosures

We enclose:

Signed authority from our client

Proof of identity

Should you require any further information to process this request, please advise promptly.

Statutory Timeframe

We expect a response within the statutory one calendar month period. If you require an extension, please confirm this in writing with full justification.

Non-Holding of Data

If your organisation does not hold the requested data, we require:

Formal written confirmation of this position

Details of any organisation believed to hold the data, including successor or archive bodies where applicable

Service of Documents

We only accept service of documents via email at evidence@mmalegal.co.uk. Should you for any reason be unable to send documents to the above email, please notify us via the same email imminently.

Yours faithfully,

Investigations Team

MMA Legal

E: evidence@mmalegal.co.uk

T: 0161 570 0550

DEED OF AUTHORITY & CONSENT

THIS DEED is made on the date of signature below by (the “Client”)	
Full Name:	George Harkness
Date of Birth:	17/07/1958
Previous Names (if any):	
Current Address:	107 Main Street Muirkirk KA18 3QS
Previous Addresses (relevant to care placements):	
CHI / NHS Number (if known):	

IN FAVOUR OF (the “Representative”)	
Firm Name:	MMA Legal
Address	SToK, 43-59 Princes Street, Stockport
Postcode	SK1 1RY
Email	evidence@mmalegal.co.uk
Telephone Number	0161 563 0816

1. STATUS AND CONSTRUCTION

- 1.1. This Deed is executed as a deed and constitutes valid written authority for the purposes of:
 - 1.1.1. UK GDPR
 - 1.1.2. Data Protection Act 2018
 - 1.1.3. Common law confidentiality
 - 1.1.4. Any related statutory, regulatory or supervisory framework
- 1.2. This Deed shall be interpreted purposively and broadly to give full effect to the Client’s intention that all personal data and Records relating to them be disclosed to the Representative, subject only to lawful statutory restriction.
- 1.3. This Deed is intended to provide clear and comprehensive authority for disclosure of the Client’s personal data.

2. APPOINTMENT

- 2.1. The Client appoints the Representative to act fully on their behalf in connection with:
 - 2.1.1. An application to Redress Scotland;
 - 2.1.2. Any review, reconsideration or appeal;
 - 2.1.3. Evidence gathering and submission;
 - 2.1.4. Any associated advisory, compensatory or restorative process.
- 2.2. Requests made by the Representative shall be treated as made personally by the Client.

3. SCOPE OF AUTHORITY

- 3.1. This Authority applies to all public and private bodies including (without limitation):
 - 3.1.1. Local Authorities and Councils
 - 3.1.2. NHS Boards and GP Practices
 - 3.1.3. Health & Social Care Partnerships
 - 3.1.4. Integration Joint Boards
 - 3.1.5. Religious bodies and orders
 - 3.1.6. Residential and foster care providers
 - 3.1.7. Education authorities and schools
 - 3.1.8. Government departments
 - 3.1.9. Archive services
 - 3.1.10. Insurers holding historical liability files
 - 3.1.11. Successor, merged or restructured public bodies
- 3.2. The Authority applies whether Records are:
 - 3.2.1. Archived, microfiche, digitised or handwritten;
 - 3.2.2. Stored off-site by contractors;
 - 3.2.3. Held by dissolved or reconstituted institutions;
 - 3.2.4. Transferred following statutory reorganisation.
- 3.3. The Client requests that records not be withheld solely on administrative grounds such as archival storage or institutional restructuring including, for example:
 - 3.3.1. The institution has closed or restructured;
 - 3.3.2. Records are archived or require manual retrieval;
 - 3.3.3. Records are held by insurers or successor bodies;
 - 3.3.4. Retrieval involves time or administrative burden.

4. SPECIAL CATEGORY DATA – EXPLICIT CONSENT

- 4.1. For the purposes of Article 9 UK GDPR and Schedule 1 Data Protection Act 2018, the Client gives explicit consent to disclosure of all special category data including:
 - 4.1.1. Physical and mental health records
 - 4.1.2. Psychiatric and psychological reports
 - 4.1.3. Therapy and counselling notes
 - 4.1.4. CAMHS records
 - 4.1.5. Social work and safeguarding files
 - 4.1.6. Ethnicity or religious data where recordedThis includes all NHS and private medical providers.

This explicit consent may be withdrawn at any time by written notice.

5. CRIMINAL OFFENCE DATA – EXPLICIT CONSENT

5.1. For the purposes of Article 10 UK GDPR and Schedule 1 Data Protection Act 2018, the Client gives explicit consent to disclosure of:

- 5.1.1. Criminal offence data
- 5.1.2. Police investigation material
- 5.1.3. Child protection investigations
- 5.1.4. Statements and intelligence logs
- 5.1.5. Outcome decisions

including records held by:

- 5.1.6. Police Scotland
- 5.1.7. Any predecessor Scottish police force
- 5.1.8. Prosecuting authorities.

6. THIRD-PARTY DATA AND REDACTION

- 6.1. The existence of third-party data shall not justify refusal to disclose the Client's personal data.
- 6.2. Where necessary, redaction shall be limited strictly to third-party information.
- 6.3. Mixed data shall be disclosed in redacted form rather than withheld in entirety.

7. PROPORTIONALITY AND REASONED DECISION-MAKING

- 7.1. Any refusal, limitation or redaction must:
 - 7.1.1. Identify the specific statutory exemption relied upon;
 - 7.1.2. Explain how that exemption applies to the particular Record;
 - 7.1.3. Confirm why partial disclosure is not possible;
 - 7.1.4. Be communicated in writing.
- 7.2. Blanket refusal without statutory justification may not satisfy statutory obligations under applicable data protection legislation.
- 7.3. Any reliance upon "disproportionate effort" must provide written reasoning demonstrating why staged disclosure or redaction is not feasible.

8. VALIDITY AND FORMAL REQUIREMENTS

- 8.1. This Deed remains valid for 24 months from execution unless withdrawn in writing.
- 8.2. Disclosure shall not be refused because:
 - 8.2.1. An internal template form has not been used;
 - 8.2.2. The Authority is considered "out of date" within internal policy;
 - 8.2.3. Additional consent is sought beyond reasonable identity verification.
- 8.3. Any organisation acting in good faith reliance upon this Deed shall be fully discharged in making disclosure.

9. REGULATORY AND STATUTORY RIGHTS

In the event of non-compliance, refusal, or unreasonable delay in responding to a lawful request made under this Deed, the Client and/or the Representative reserve the right to pursue any statutory or regulatory remedies available under applicable law.

This may include raising concerns with the relevant supervisory authority or regulator where appropriate.

Nothing in this Deed limits the Client's rights under the UK GDPR, the Data Protection Act 2018, or any other applicable statutory framework.

Withdrawal shall not invalidate disclosures already made in reliance upon this Deed.

EXECUTION AS A DEED

Signed and delivered as a Deed by the Client:	
Signature	
Print Name	George Harkness
Date	11/03/2026

Witness	
Name	James Ryan
Address	SToK, 43-59 Princes Street, Stockport, SK1 1RY
Occupation	Case Handler
Signature	James Ryan
Date	11/03/2026

Completion Certificate

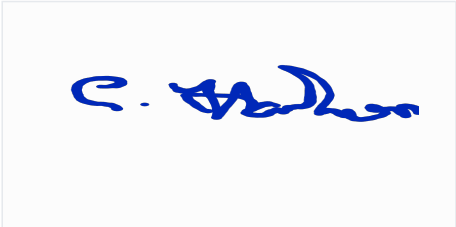
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Document Details

Document Name(s): part-1, part-3, cfa, loa, fee-clarity
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Signer Information

Name: Mr George Harkness
Email: 19george58@gmail.com
Telephone: 07706505537
IP Address: 82.132.213.193



Verified Electronic Signature

Audit Trail

Action	Timestamp	IP Address
Created	2026-03-11 17:52:54	System
Document link sent to client by email	2026-03-11 17:52:54	System
Document link sent to client by sms	2026-03-11 17:52:55	System
Document link opened by client	2026-03-11 18:02:53	195.21.72.3
Document electronically signed	2026-03-12 14:03:31	82.132.213.193

Security Verification

SHA-256 Checksum: 5b5e30f11d067550aed9abd4096a4cc1fe5a9ead831fc18c8a698edd4b0d8bf2

This document is a legally binding record of the e-signature process.

SunLife

Guaranteed Over 50 Plan

40502_DM007234220
Mr George Harkness
107
Main Street
Muirkirk
Cumnock
KA18 3QS

00GK24HPC00073
006066/00GK24HPC



March 2026

How far will your £2,189 go?

Dear Mr Harkness,

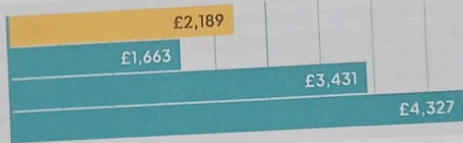
It's great to know you've already started with SunLife and set money aside for your loved ones. Here's your annual Statement of Cover. Please check your details are correct and you're still happy with the amount you're leaving.

How much are funerals in Scotland?

You might already have enough to cover your needs, but it's good to be aware of rising funeral costs. Have a look below to see how much a funeral could cost you – and how far your payout will go.*

Your cash payout

Direct cremation
Cremation with a service
Burial with a service



Send-off costs UK average: £1,312

Amount organisers spend on optional extras like catering, flowers and venue hire, on top of the funeral service.

Another whole-of-life insurance plan can give them even more when it matters most – helping further towards funeral costs, or simply leaving them a little extra.

When you take out your new **Guaranteed Over 50 plan**, you'll get:

- ✓ Bigger payout than new customers for the same monthly premium, with a time-limited boost if you take out your plan by 28th April
- ✓ £140 gift card to spend in the shops you love
- ✓ Access to a FREE Health and Wellbeing Service

Don't forget, your affordable premiums will never rise. Find out more in the **Important to know** and **Information** sections on the back of this letter.

Yours sincerely,

Mark Screeton
Mark Screeton, CEO

SunLife – Protecting families since 1810

* Funeral costs are based on regional averages. Funerals with service include collection and care of deceased, pre-paying disbursements, hearse, wood-effect coffin, and fees for burial/cremation. Send-off cost is national average and weighted by percentage of organisers choosing optional extras. SunLife Cost of Dying Report 2026. Read more at sunlife.co.uk/funeral-costs