

Subject Access Request Procedure

Firthmoor Primary School



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1.0	Initial Draft	Tristen Coad	Amie Chambers	Sept 2023
1.1	Annual Review	Tristen Coad	Amie Chambers	31/01/2025
Considerations, Definitions & Terms				
School	Nursery, School, Academy, Trust, College, SAT, MAT			
Learner	Pupil, Student, Child, Children			
Parent	Parent, Guardian, Person(s) of care, holder of parental responsibility, Person in Parental Responsibility for a Learner			
Office Manager	Administrative Lead, School/Trust Business Manager, Administrative Manager			
Headteacher	Headteacher, Principal, CEO, Deputy CEO, Executive Headteacher, Head of School			
Senior Leader	Any and all members of Senior Leadership Team / Executive Leadership Team			

1. Scope

All personal data processed by **The School** is within the scope of this procedure.

Data subjects are entitled to obtain:

- Confirmation as to whether **The School** is processing any personal data about that individual;
- The purpose(s) of **The School** processing any personal data about that individual;
- Making aware of their rights as data subjects (complaints, withdrawal of consent, rectification and erasure);
- The categorise of personal data concerned;
- Retention period of storing the data;
- The source of the information if not collected from the data subject;
- Access to their personal data;
- Any related information;

2. Responsibilities

- 2.1 The Data Protection Officer (DPO) is responsible for the application and effective working of this procedure, and for reporting to the information owners on Subject Access Requests (SARs).
- 2.2 The Data Protection Officer (DPO) is responsible for handling all SARs.

3. Procedure

- 3.1 Subject Access Requests are made using the Subject Access Request.
- 3.2 The data subject provides **The School** with evidence of their identity via two forms of identification which can be:
 - 3.2.1 Current passport.
 - 3.2.2 Driving license.
 - 3.2.3 Utility bill (from last 3 months).
 - 3.2.4 Current vehicle registration document.
 - 3.2.5 Birth certificate.
- 3.3 The data subject's signature on their identity must be cross-checked to that on the application form.
- 3.4 The data subject specifies to **The School** specific set of data held by **The School** on their subject access request (SAR). The data subject can request all data held on them.
- 3.5 **The School** records the date that the identification checks were conducted and the specification of the data sought.
- 3.6 **The School** provides the requested information to the data subject within one month from this recorded date. Under the GDPR Article 12 (3), that period may be extended by two further months where necessary, taking into account the complexity and number of the requests. **The School** shall inform the data subject of any such extension within one

month of receipt of the request, together with the reasons for the delay. Where the data subject makes the request by electronic form means, the information shall be provided by electronic means where possible, unless otherwise requested by the data subject.

- 3.7 Once received, the subject access request (SAR) application is immediately forwarded to the Data Protection Officer (DPO), who will ensure that the requested data is collected within the specified time frame in clause 3.4 above.

Collection entails:

- 3.7.1 Collecting the data specified by the data subject, or
- 3.7.2 Searching all databases and all relevant filing systems (manual files) in **The School**, including all back up and archived files (computerised or manual) and all email folders and archives. The Data Protection Officer (DPO) maintains a data map that identifies where all data in **The School** is stored.
- 3.8 The Data Protection Officer (DPO) maintains a record of requests for data and of its receipt, including dates.
- 3.9 The Data Protection Officer (DPO) reviews subject access requests from a child. Before responding to a SAR of the child data subject the Data Protection Officer (DPO) considers their ability to making the request by adequately explaining any implications of sharing their personal data, etc.
- 3.10 The Data Protection Officer (DPO) reviews all documents that have been provided to identify whether any third parties are present in it, and either removes the identifying third party information from the documentation or obtains written consent from the third party for their identity to be revealed.
- 3.11 If any of the requested data is being held or processed under one of the following exemptions, it does not have to be provided:
- National security
 - Crime and taxation
 - Health
 - Education
 - Social Work
 - Regulatory activity
 - Journalism, literature and art
 - Research history, and statistics
 - Publicly available information
 - Corporate finance
 - Examination marks
 - Examinations scripts
 - Domestic processing
 - Confidential references
 - Judicial appointments, honours and dignities
 - Crown of ministerial appointments
 - Management forecasts
 - Negotiations
 - Legal advice and proceedings
 - Self-incrimination
 - Human fertilization and embryology

- Adoption records
- Special educational needs
- Parental records and reports

3.12 In the event that a data subject requests **The School** to provide them with the personal data stored by the controller/processor, then **The School** will provide the data subject with the requested information in electronic format, unless otherwise specified. All of the items provided to the data subject are listed on this schedule Subject Access Request Record) that shows the data subject's name and the date on which the information is delivered to and received by the data subject.

3.13 In the event that a data subject requests what personal data is being processed then **The School** provides the data subject with the following information:

3.13.1 Purpose of the processing

3.13.2 Categories of personal data

3.13.3 Recipient(s) of the information, including recipients in third countries or international organisations

3.13.4 How long the personal data will be stored

3.13.5 The data subject's right to request rectification or erasure, restriction or objection, relative to their personal data being processed.

3.13.5.1 **The School** removes personal data from systems and processing operations as soon as a request for erasure has been submitted by the data subject.

3.13.5.2 **The School** contacts and communicates with other organisations, where the personal data of the data subject is being processed, to cease processing information at the request of the data subject.

3.13.5.3 **The School** takes appropriate measures without undue delay in the event that the data subject has: withdrawn consent; objects to the processing of their personal data in whole or part; no longer under legal obligation and/or has been unlawfully processed.

3.13.6 Inform the data subject of their right to lodge a complaint with the supervisory authority and a method to do.

3.13.7 Information on the source of the personal data if it hasn't been collected from the data subject.

3.13.8 Inform the data subject of any automated decision-making.

3.13.9 If and where personal data has been transferred and information on any safeguards in place.

3.14 **The School** uses the following electronic formats to respond to SARs:

3.14.1 PDF

3.14.2 RTF