SEAX TRUST
GDPR
Subject Access Request (SAR) Policy

GDPR – SUBJECT ACCESS REQUEST POLICY

Other Policies relating to this Policy:
GDPR CCTV School Template Policy

Effective Date of Adoption:	8th February 2023
Policy Details:	This is a **Trust** Policy covering all SEAX Trust Provisions For publication on School & Trust websites

Changes made at review February 2023:

Section	Details
Main Section	Wording adapted to allow more flexibility in returning documents requested under a SAR, following recommendation in GDPR Audit 2022.
Appendix B	Appendix added following recommendation in GDPR Audit 2022: Template response to a SAR.

This policy will be reviewed as required in line with changes to Data Protection Legislation

Subject Access Requests

Any individual, person with parental responsibility or young person with sufficient capacity has the right to ask what data the Trust/academy holds about them, and can make a Subject Access Request (SAR).

A SAR can be made using the 'Subject Access Request' form (Appendix A).

The DPO/Data Controller has been designated as the person who will coordinate the response to a SAR. Prior to responding to a SAR, the school must inform the Trust's Central Team who will hold records at Trust-level in order to comply with audit requirements.

The school is required to provide the individual with the data it holds on them within one calendar month.

The response to the SAR will be provided in the most appropriate secure form, depending on individual circumstances. This may be on paper, electronically or by another means, as required. To ensure complete confidentiality in relation to third parties, when sending documents by electronic means, all documents which are to be shared with the individual requesting the SAR **must** be redacted by hand using a black marker pen, before being scanned in and sent by protected electronic means.

It is permissible to ask the individual who has made the request to be more specific about the information that they require in order to ensure that the information they are provided with meets their requirements rather than providing lots of information that may not be relevant to their query.

Evidence of the identity of the person making the request and their relationship to the pupil must be gained prior to any disclosure of information. This should be recorded on the SAR Log (Appendix A, Part B).

This policy is for public use and should be published on School/Trust websites.

Exemptions to a SAR include:

- Education, Health, Social Work records
- Examination marks and scripts
- Safeguarding records
- Certain aspects of special educational needs
- Parental records and reports
- Legal advice and proceedings
- Adoption and Court records and/or reports
- Regulatory activity and official requests e.g. DfE statistical information
- National security, Crime and taxation
- Journalism, literature and art
- Research history, and statistics
- Confidential references

Appendix A

Subject Access Request (SAR) Form

Part A: Data Subject's Details (person whose information you are requesting)

Title:	
Full Name:	
Date of Birth:	
Address:	
Year Group (if pupil at school)	

Part B: Requestor Details

Title:	
Full Name:	
Address:	
Phone Number:	
Email Address:	
Evidence of Identity (e.g. passport, driving license):	Evidence Provided? Yes / No Details:
Status of Requestor:	Data Subject: Yes / No Parent or person with parental responsibility: Yes / No Other: Yes / No If you have selected 'yes' for 'Other', please outline your role here:

Part C: Details of Subject Access Request

Details of Data Being Requested:	

Part D: Declaration

Please complete Option 1 or Option 2, as is relevant:

Option 1

I , ...(Insert your name), hereby request that

.... (Insert School/Academy name) provide the data requested about me.

Signed:_____ Date:_____

Option 2

I , ...(insert your name), hereby request that

.... (insert name of School/Academy) provides the data requested about

.... (insert child's name) on the basis of the authority that I have.

Signed:_____ Date:_____

Appendix B
Template Response to a SAR

\<School Letterhead\>

\<Name\>
\<Address\>

<div align="right">

\<Date\>
</div>

Dear \<Name\>,

Subject Access Request Response

We are responding to your Subject Access Request dated \<date\> where you requested a copy of all information held and processed by \<school name\> concerning your child, \<name\>.

The school has searched the physical records and electronic records that are held in order to respond to your request. (Examples are included below; please delete from your final copy)

Response Document Ref No.	Description of the data provided	Purpose of the data processing	Source of the data	Recipients of the data	Period of data storage
1	E.G. Letter to Mrs X dated 22nd October 2019, copied to yourself, regarding pupil x's progress at school and the impact his late arrival has on this.	Public task	Electronic copy stored on school ICT network	Headteacher, Mrs X, Mr X	Retain whilst the child remains at primary school
2	E.G. Attendance summary of pupil x 01/09/2019 to current date.	Public task & legal obligation	SIMS management information system	Capita, Headteacher, Class Teacher, Admin Staff	3 years after the date on which the entry was made
3	E.G. Records of contact from period 6th September 2019 to 4th February 2020 related to pupil x involving school and Mr X.	Public task	Pupil's educational record	Headteacher	Retain whilst the child remains at primary school
4					
5					
6					

The school has not undertaken any automated decision making on the data provided.

The school also holds records of <describe records>; however, these have not been included within the response because <insert basis for excluding the response>.

I hope that this provides a satisfactory response to your request.

Yours sincerely

<insert name>
<insert position>