



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:	24th June 2026
Review Date:	Every Two Years

This is a **Trust** Policy covering all SEAX Trust Provisions, ratified by **Resources, Audit & Risk Committee** on behalf of the Board of Trustees

For publication on School & Trust websites.

Changes in line with advice from DPO (SBM Services) June 2026:

Section	Details
Extensions to the One Month Timeframe P3	Addition of the 'reasonable and proportionate' expectation for searches
'Stopping the Clock' P4	Section added 'Stopping the Clock', explaining situations when the one month response time can be lengthened
Exemptions P5	Addition of exemption for certain employment references
Page 5	Addition of link to the ICO website Addition of information regarding process during school closure periods
Throughout	Reordering of information and new Titles grouping information for ease of reading

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

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Subject Access Requests

Requests for a SAR

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). It is preferable for a Subject Access Request to be made using the 'Subject Access Request' form (Appendix A), but a SAR can also be made by email, letter or verbally.

Responses to a SAR

The **GDPR Lead** in the Trust's Central Team is designated as the person who will oversee coordination of the response to a SAR. The work of producing and collating SAR documentation will be done at the individual school level for practical purposes. Prior to responding to a SAR, the school must inform the Trust's Central Office, which is required to 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.

The response to the SAR will generally be provided in the same format that the request was submitted by the individual.

Schools should use the template letter at **Appendix C** to acknowledge receipt and in order to ensure concise and specific information is accessed. The template letter at **Appendix D** should be used when sending SAR information.

GDPR Leads and administrators should use the Checklist at **Appendix B** to ensure the process is completed fully. This policy is for public use and should be published on School/Trust websites.

Extensions to the One-Month Timeframe

The school/trust can extend the time to respond by a further two months if the request is complex or they have received a number of requests from the individual. The individual must be contacted at the earliest opportunity, but at least within one month of the school/trust receiving their request and explain why the extension is necessary.

It is permissible to ask the individual who has made the request to be more specific about the information required in order to ensure that the information they are provided with meets their requirements, rather than providing lots of information which may not be relevant to their query. In line with the Data (Use & Access) Act 2025, all searches must be '**reasonable and proportionate**'.

Identification

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). SARs must only be released to the data subject or those with verified parent/carer

responsibility and evidence of identification must be established prior to disclosure. It is essential to ensure that email addresses are genuine before dispatch and to request additional identification from a verifiable source if necessary. Where a SAR is requested by unrelated third parties (eg solicitors/ legal firms) additional identification and confirmation of email address from the relevant parent/carer or a verified source such as the police will be required. The school must be completely confident that the individual making the request and the reasons for doing so are genuine before data is released. Each request must be considered on its own merits, but as a general rule the following acts as a guide:

Individual making request	Identification Required before releasing physical documents	Identification Required before releasing emailed documents
Person with parental responsibility (parent/carer)	Known to the school as the relevant parent/carer by sight or One form of photographic identification complying with records held at the school.	Email address already held on school records.
Individual data subject	Over the age of 16 years, unless Gillick competence can be established.	To a school-based email address.
Third Party	N/A - email only.	Understanding of connection to the pupil and why data is required and Provision of an individual email address (ie not an admin/ general email address) from parent/carer or figure of authority (eg police) and signed authorisation and Verification of email address by telephone to the third party prior to dispatch

"Stopping the Clock"

The one-month clock can be paused under the following specific circumstances:

- **Identity Verification:** If an organization needs to verify the identity of the individual requesting the SAR, the clock does not start until the required ID is provided.
- **Clarification:** If the request is too broad, the clock pauses while the organization asks for specification as to which exact information or processing activities are required.

Exemptions

Exemptions to a SAR include the following, but this is not a definitive list:

- Third party data, for example information about other pupils or adults that are not the data subject or individual making the request
- Data that could lead to a risk of harm to the data subject or individual making the request
- Information that is not the personal data of the data subject or individual making the request

- Management information
- Records relating to a live investigation (e.g. an ongoing complaint, behaviour, grievance, disciplinary matter etc)
- Education, Health, Social Work records
- Examination marks and scripts
- Safeguarding records
- Special educational needs records
- 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
- Employment References which are marked 'Strictly Confidential – Employment Reference'

For full details of exemptions to SARs please visit the ICO website: [A guide to the data protection exemptions | ICO](#)

PLEASE NOTE: During school closure periods, Subject Access Requests will be managed via the process set out on the Trust/Academy websites.

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* and relationship to the pupil (e.g. passport, driving licence, utility bill):	(*Refer to table above) Evidence Provided? Yes / No Relationship to Pupil: 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:	
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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 – GDPR Lead Checklist when responding to a SAR

Details	Checklist/Notes
School Name:	
Subject's Name:	
Date request received:	
Date documents are to be received by requestor (within one month):	
Evidence of requestor's identity received	
Acknowledgement letter sent (Appx C):	
Relevant documents collated including those from: Email correspondence Arbor My Concern Confide SharePoint/One Drive Paper files – Pupil/Staff etc Notebooks – staff/reception etc Other areas relevant to request	
Documents redacted* by hand – ensure redacted wording cannot be read	
Documents re-scanned if sending by electronic means	
GDPR Lead at SEAX Central Team informed	
DPO informed prior to sending – ensure no documents are exempt	
Documents sent securely with cover letter (Appx D)	

*Redaction

Third party names and other means of identification must be fully redacted. It is not necessary to redact staff names, as staff act in a professional capacity.

Safeguarding information: Each record should be considered individually, with any third-party data being redacted and consideration given to whether including the records puts the child at any risk of harm. An example of this would be where a record references that a child has confided in a teacher and shared information about the parent making the subject access request.

Appendix C - Template Letter acknowledging a SAR

<School Letterhead>

<Name>

<Address>

<Date>

Dear <Name>,

Subject Access Request Acknowledgement of receipt and request for additional information

I write to acknowledge receipt of your Subject Access Request dated <date> requesting a copy of information held and processed by <school name> concerning your child, <name>.

The School aims to provide this information within one calendar month. However, depending on the amount of information required, it is hoped that we may be in a position to submit this to you sooner.

[FOR USE IF CLARIFICATION IS REQUIRED: With this in mind, I am writing to seek clarification as to the exact nature of your request, in order that we may narrow down our search as far as possible. I shall therefore be grateful if you will kindly complete and return the form below at your earliest convenience, so that we may begin collating the relevant documents.]

I must also advise you that it is a mandatory requirement for us to obtain **identification** from an individual making such a request and I shall therefore also be grateful if you will kindly arrange to provide ~~two~~ suitable identification documentation to the school at your earliest convenience. Please note that identification documents must be provided in their original form (copies cannot be accepted). In cases where information is required concerning a pupil or student, please also advise the school as to your relationship to the individual in question. SAR information cannot be released until sufficient identification is provided.

Should you have any difficulties, please contact the school office, where further information and assistance is available.

With very many thanks

Yours sincerely

Headteacher

[INCLUDE ONLY WHERE CLARIFICATION IS REQUIRED] Subject Access Request - request for additional information

Name: Name of subject:

Email address to which response should be sent:

Telephone number for relevant queries:

Please provide me with all details held in relation to *(please tick all relevant boxes)*:

- Curriculum eg class work/ homework
- After-school activities
- Pre-school activities eg breakfast club
- Trips/visits
- Specialist support eg therapeutic services
- Behaviour eg interventions and support
- Transport
- Incidents/Accidents
- Progression
- Safeguarding/Pastoral
- Peer-to-peer information
- Outside agencies eg Essex County Council
- Medical
- Attendance
- Correspondence between (name) and (name)
- Other: Please annotate:

.....

The dates my request covers are:

from *(dd/mm/yy)*: To *(dd/mm/yy)*:

..

Signed: Date

Appendix D - Template Letter sending documents from a SAR

<School Letterhead>

<Name>

<Address>

<Date>

Dear <Name>,

Subject Access Request

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 22 nd 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 6 th September 2019 to 4 th 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					

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

Headteacher