



HOPE LEARNING COMMUNITY

Subject access request policy



HOPE LEARNING COMMUNITY

Data Protection - subject access request policy

Approved by trustees:
May 2023
Review every 2 years.

*To be published on school website/linked to trust website
and made available to all staff*

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Subject Access Requests

Any individual, person with parental responsibility or young person with sufficient capacity has the right to ask what data the Hope Learning Community and its schools and college 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 Director of Governance and Compliance has been designated as the person who will coordinate the response to a SAR with assistance from the Data Protection Lead in the relevant school/college.

The Hope Learning Community and its schools and college is required to provide the individual with the data it holds on them within one calendar month. The 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 within one month of the trust, school or college receiving their request and explain why the extension is necessary.

The response to the SAR can be electronic, hard copy or verbal and will typically mirror the format that the initial request came in from the individual unless they have reasonably requested an alternative format. The individual making the request is only entitled to their own personal data. Care should be taken to ensure that redaction is securely applied to ensure that the individual does not receive any third party data within their response or any data that is not their own personal data. Advice on redaction can be taken from the Data Protection Officer

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 trust's SAR Log (Appendix B).

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

Exemptions to a SAR may 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

For full details of exemptions to a SAR please visit the ICO website:

<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/exemptions/>

Appendix A

Template 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: Requester Details

Title:	
Full Name:	
Address:	
Phone Number:	
Email Address:	
Evidence of Identity (e.g. passport, driving license):	Evidence Provided? Yes / No Details:
Status of Requester:	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

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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/College) provides the data requested about

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

Signed: _____ Date: _____

Appendix B

Template Subject Access Request (SAR) Log

Data Subject	Request	Date of SAR	Date DPO notified	ID confirmed	Response Deadline	Extension to Deadline?	Data held by school	Any additional info from requestor?	Any info to be withheld?	Who auth'd with-holding info?	Response checked and approved by DPO
E.g. John Smith	All data held about this staff member	01/02/18	01/02/18	Passport seen 02/02/18	01/03/18	08/03/18: 1 week due to Feb ½ term.	Personnel file – hard copy Email correspondence about individual	JS clarified the request links to a grievance they have with their line manager	Redacted email correspondence to remove reference to other employees	DPO 20/02/18	DPO 01/03/18