

SUBJECT ACCESS REQUEST PROCEDURE

January 2024

Hollyfield Primary School
...a place where everyone matters



Version:

January 2024

Ratified by the Governing Body:

7 February 2024

Signed by the Governing Body:

To be reviewed:

January 2027

1. Scope

All personal data processed by Hollyfield Primary School is within the scope of this procedure.

Data subjects are entitled to obtain:

- Confirmation as to whether Hollyfield Primary School is processing any personal data about that individual;
- Access to their personal data;
- Any related information;

2. Responsibilities

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

3. Procedure

- 3.1 Subject Access Requests are recorded using the Subject Access Request Record (GDPR 013).
- 3.2 The data subject provides Hollyfield Primary School with evidence of their identity, in the form of a copy of their current passport or driving license, and the signature on that form of identity must be cross-checked to that on the application.
- 3.3 If the data subject does not hold a current passport or driving license two copies of other identification documents may be accepted as an alternative, such as:
 - birth certificate;
 - utility bill from preceding three months bearing current address;
 - current vehicle registration document;
 - bank statement from preceding three months;
 - current rent book.
- 3.4 The data subject specifies to Hollyfield Primary School a specific set of data held by Hollyfield Primary School on their subject access request (SAR). The data subject can request all data held on them.
- 3.5 Hollyfield Primary School records the date that the identification checks were conducted and the specification of the data sought.
- 3.6 Hollyfield Primary 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 controller 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, who will ensure that the requested data is collated within the specified time frame.
Collation entails:

- 3.7.1 Collecting the data specified by the data subject, or
- 3.7.2 Searching all databases and all relevant manual filing systems held by Hollyfield Primary School, including all back up and archived files (computerised or manual) and all email folders and archives. Hollyfield Primary School maintains an inventory that identifies where all data in Hollyfield Primary School is stored.
- 3.8 The Data Protection Officer will maintain a record of requests for data and of its receipt, including dates.
- 3.9 The Data Protection Officer will ensure all documents that have been provided are reviewed by a competent employee to identify whether any third parties are present in it, and the identifying third party information is redacted from the documentation or written consent from the third party is obtained for their identity to be revealed.
- 3.10 If any of the requested data is being held or processed under one of the following non-exhaustive list of exemptions, it does not have to be provided:
 - [Publicly available information](#)
 - Examination marks
 - Examinations scripts
 - [Confidential references](#)
 - Management forecasts
 - Negotiations
 - [Legal advice and proceedings](#)
 - Self-incrimination
 - Adoption records
 - Special educational needs
- 3.11 In the event that a data subject requests Hollyfield Primary School to provide them with the personal data stored by the controller/processor, then Hollyfield Primary 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 the record that shows the data subject's name and the date on which the information is delivered to the data subject.
- 3.12 In the event that a data subject requests what personal data is being processed then Hollyfield Primary School will provide the data subject with the following information:
 - 3.12.1 Purpose of the processing
 - 3.12.2 Categories of personal data
 - 3.12.3 Recipient(s) of the information, including recipients in other countries or international organisations
 - 3.12.4 How long the personal data will be stored
 - 3.12.5 The data subject's right to request rectification or erasure, restriction or objection, relative to their personal data being processed.
 - 3.12.5.1 Hollyfield Primary School will remove personal data from systems and processing operations as soon as a request for erasure has been submitted by the data subject.
 - 3.12.5.2 Hollyfield Primary School will contact and communicate 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.
 - 3.12.5.3 Hollyfield Primary School will take 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, is no longer under legal obligation and/or their data has been unlawfully processed.

- 3.12.6 Inform the data subject of their right to lodge a complaint with the ICO and how to do so.
 - 3.12.7 Provide information on the source of the personal data if it has not been collected directly from the data subject.
 - 3.12.8 Inform the data subject of any automated decision-making.
 - 3.12.9 If and where personal data has been transferred and information on any safeguards in place.
- 3.13 The Data Protection Officer will review all subject access requests received from a child. A child has a right of access to the information held about them but, in most cases, these rights are likely to be exercised by those with parental responsibility for them. However, before responding to a SAR for information held about a child, you should consider whether the child is mature enough to understand their rights. It is reasonable, in most cases, for a child that is aged 12 years or more has the capacity to make a subject access request. The implications of sharing their information with others should be explained to a child aged 12 or more because it should not be assumed it is fully understood.

Document Owner and Approval

The Data Protection Officer is the owner of this document and is responsible for ensuring that this policy document is reviewed in line with the review requirements stated above. A current version of this document is available to all members of staff.