



# Federation of Kymbrook & Thurleigh Primary Schools

*Working in partnership with families to unlock the potential of every individual.  
Together, we nurture a self-belief and a lifelong passion for learning.*

## Subject Access Request (SAR) Policy

Enjoyment – Enrichment – Excellence – Equality

|              |              |
|--------------|--------------|
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## Table of contents

|  | Page no. |
|--|----------|
| What is personal data?                                       | 3        |
| How to make a Subject Access Request (SAR)                   | 3        |
| Charges for SARs   | 3        |
| Confirming the requester's identity                          | 3        |
| Making a SAR on behalf of someone else                       | 4        |
| Clarifying a SAR   | 4        |
| How long will information resulting from a SAR be available? | 4        |
| Information that is exempt from SARs                         | 4        |
| How information is provided                                  | 4        |
| Monitoring our compliance with responding to SARs            | 5        |
| Complaints about our Subject Access Request procedure        | 5        |
| Subject Access Request (SAR) Form                            | 6        |

## What is personal data?

For information to be personal data, it must relate to a living individual and allow that individual to be identified from that information (either on its own or in conjunction with other information held alongside it). The individual to whom the personal data relates to is the 'Data Subject'.

A Subject Access request (SAR) can be made by

- any parent/carer acting on behalf of their child(ren) as the Data Subject or
- any parent/carer acting in their own individual right as the Data Subject or
- any member of staff as the Data Subject

To find out what personal information is held about them.

## How to make a Subject Access Request (SAR)

A request can be submitted to the school via the **Subject Access Request (SAR) Form** which can be found at the back of this document.

The SAR Form must be submitted directly to the Data Protection Lead to avoid delay in dealing with the request. Our Data Protection Lead is specifically responsible for responding to a SAR.

If our school receives a request for information in writing by letter or email, we will ask the requester to complete our SAR Form so that our Data Protection Lead can process your request quickly and easily.

We aim to deal with SARs efficiently and transparently and our Data Protection Lead will consult with the requester about how best we can provide the information requested. We will ask the requester about their preferred method of receiving the information. However, in cases where supplying a copy of the requested information in a hard copy would result in disproportionate effort, we would evaluate the particular circumstances of each request and reach agreement with the requester as to an alternative way of satisfying the request.

We will ascertain the most appropriate and secure way to provide you with the information.

## Charges for SARs

A Subject Access Request is **free of charge**. However the school has the right to charge a reasonable administrative- cost fee should the request be excessive (i.e. involves complex data retrieval) or repetitive (i.e. involves additional copies of information already provided) which imposes a disproportionate administration burden on the school. We will provide evidence of how we make this decision about a request being excessive where appropriate.

## Confirming the requester's identity

We will ask the requester for some form of ID to ensure that the person making the request is the individual to whom the personal data relates (or a person authorised to make a SAR on their behalf). We will also check that we have the requester's correct postal address.

When dealing with SARs for personal data relating to a pupil at our school, we will clarify whether the requester has parental responsibility for the child or has the authorization to act on their behalf.

## Making a SAR on behalf of someone else

If the requester is making a SAR on behalf of someone else (the 'Data Subject'), we need to be satisfied that the 'third party' requester making the request is entitled to act on behalf of the Data Subject. It is the responsibility of the third party requester to provide evidence of this entitlement to the school.

The school has discretion in deciding whether information in response to a SAR is disclosed to a third party who has made the SAR on behalf of the Data Subject or disclosed directly to the Data Subject. If disclosed directly to the Data Subject, then the Data Subject can choose to share the information with the third party if they wish.

## Clarifying a SAR

Before we respond to a SAR, we may ask for additional information from the requester to enable us to find the personal data covered by the request.

Each SAR received will be acknowledged and once the necessary ID checks have been satisfied and clarification sought regarding the context of the personal data being requested, we will inform the requester of the date by which the response must be provided (within one month).

## How long will information resulting from a SAR be available?

In accordance with the GDPR regulations, the school will provide the required information within one month from the date the school is satisfied with the confirmation of the identity of the requester and agreed the nature and requirements of the information being requested. The school has the right to extend this period for particularly complex requests which may require more time to process.

If a SAR is received by the school's email or post during a school holiday, the SAR will be responded to when the email or post is monitored periodically during that holiday period, we would then contact the requestor so they were aware we were now in receipt of the request.

If there is a delay in dealing with the request for any reason, we will contact the requester to explain the reason and the expected date for the response.

## Information that is exempt from SARs

Certain types of personal data are exempt from SARs because of its nature or effect its disclosure may have (e.g. safeguarding or legal issues) or where disclosure would involve information about another

individual. In these cases, we will explain to the requester the reasons why information requested cannot be disclosed.

## How information is provided

Our responses to a SAR will include an explanation of the searches that have been made to deal with the request and the information revealed by those searches so that the requester is able to understand whether they have received all the information they are entitled to.

## Monitoring our compliance with responding to SARs

We retain a log of SARs received which includes the details of requests received which we update to monitor progress as the SAR is processed. The log contains copies of the information supplied in response to the SAR together with copies of any material withheld and an explanation why.

We also monitor the time period for responding to SARs as well as deal with requests that have not been dealt with within the one month timeframe.

Compliance with dealing and responding to SARs is monitored and discussed at senior leadership level and with our Trust Board/Board of Governors.

## Complaints about our Subject Access Request procedure

If the requester believes that a request for information has not been dealt with properly, the requester should make a complaint to the school through our normal complaints procedure. If following the conclusion of the complaints procedure within the school, the requester is still dissatisfied or the original decision is not reviewed, the requester can complain directly to the Information Commissioner's Office (ICO) at <https://ico.org.uk/concerns>.

### Subject Access Request (SAR) Form

You can use this form to request access to your personal information held by our school. Our school's **Privacy Notices** detail the personal information held, how we use this information and the reasons why we share this information.

You should describe the information you need as clearly as possible: it is not sufficient to ask for "everything about me". If your request is too broad or unclear, we may need to ask you to be more specific.

In addition, you must also enclose **proof of your identity** such as a photocopy of your passport, driving licence, or birth certificate.

This Subject Access Request form and proof of identity should be sent to our Data Protection Lead at the following address:

Thurleigh Primary School

High Street

Thurleigh

MK44 2DB

or emailed to [thurleigh@ktfederation.co.uk](mailto:thurleigh@ktfederation.co.uk).

If you need assistance with completing this form or have any questions regarding the SAR process, please contact our Data Protection Lead on 01234 771 252 or e-mail [thurleigh@ktfederation.co.uk](mailto:thurleigh@ktfederation.co.uk)

### Section 1 – Details of person requesting information (requester)

|  |  |
|--|--|
| <b>Title :</b>                             | Mr <input type="checkbox"/> Mrs <input type="checkbox"/> Miss <input type="checkbox"/> Ms <input type="checkbox"/> Title (please state): |
| <b>Forename(s):</b>                        |  |
| <b>Surname:</b>                            |  |
| <b>Daytime Telephone No:</b>               |  |
| <b>Email Address:</b>                      |  |
| <b>Current Address including postcode:</b> |  |
|  |  |
|  |  |

## Section 2 - Are you the Data Subject?

- Yes - I am the Data Subject** (the person the information is about) (go to Section 4 ):  
*As the Data Subject, you will need to provide evidence of your identity so that we can check we are releasing the data to the correct person*
- No - I am acting on behalf of the Data Subject** (go to Section 3)  
*If you are acting on behalf of another adult, you must provide written authorisation from the Data Subject to obtain their personal data before this request can be processed. We will still require confirmation of the identity of the Data Subject.*  
*If you are acting on behalf of a child, you must provide evidence of parental responsibility*

## Section 3 – Details of Data Subject (if different from Section 1)

|  |  |                       |
|--|--|-----------------------|
| <b>Title (please tick one):</b>  | Mr <input type="checkbox"/> Mrs <input type="checkbox"/> Miss <input type="checkbox"/> Ms <input type="checkbox"/> | Title (please state): |
| <b>Forename(s):</b>  |  |                       |
| <b>Surname:</b>  |  |                       |
| <b>Current Address including postcode:</b>   |  |                       |
|  |  |                       |
|  |  |                       |
|  |  |                       |
| <b>My relationship to the data subject is:</b>   | (e.g. parent; carer; legal representative)   |                       |
| <b>If the Data Subject is an adult, I have provided evidence of authorisation from the Data Subject to act on their behalf</b><br><i>(e.g. letter of authority; Power of Attorney)</i> | <input type="checkbox"/> Yes <input type="checkbox"/> No   |                       |
| <b>If the Data Subject is a child, I have provided evidence of parental responsibility for the Data Subject</b>  | <input type="checkbox"/> Yes <input type="checkbox"/> No   |                       |



Receive the information in electronic format in *You will be sent an email to the email address entered in Section 1\*\* with your personal data included in encrypted attachments. You will need to download the appropriate software to decrypt the data. Details of the encryption software will be provided at the time your request is made*

*\* We will ensure that the information is addressed correctly. However, we cannot be held liable if the information is lost in the post or incorrectly delivered or opened by someone else in your household.*

*\*\* If you are making the request on behalf of another adult, we will in the first instance contact the Data Subject for authorisation regarding who we send the information to*

## Section 6 – Declaration

Verification of identity is required before your request can be processed.

I enclose as verification of identity a photocopy of my:

Driving Licence       Passport       Birth Certificate       Other

### Data Subject Declaration

**I certify that, to the best of my knowledge, the information I have provided in this form is correct.**

**I understand that the school is obliged to confirm proof of identity/authority and it may be necessary to obtain further information in order to comply with this subject access request.**

Print Name: \_\_\_\_\_

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

OR

### Authorised person Declaration

**I confirm that I am legally authorised to act on behalf of the Data Subject.**

**I understand that the school is obliged to confirm proof of identity/authority and it may be necessary to obtain further information in order to comply with this subject access request.**

Print Name: \_\_\_\_\_

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

*The information you have provided in this form will be kept confidential and kept for as long as necessary in accordance with our data retention schedule and will be disposed of in a safe and secure manner.*

| Office Use                           |                        | SAR Reference No     |  |
|--------------------------------------|------------------------|----------------------|--|
| Actioned By                          |                        | Date Form Received   |  |
| ID Checked Date                      |                        | Agreed Response date |  |
| Information requested confirmed Date |                        | Date Responded       |  |
| Notes                                | Added to SAR Log Y / N |                      |  |