



# Subject Access Request Procedure

Author: G Williams	Position: AHT	
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## 1 Overview

Under the General Data Protection Regulation (GDPR), data subjects have the right to obtain confirmation that their data is being processed, access to their personal data and the right to be informed of processing via a privacy notice. The right of individuals to access their personal information can be fulfilled via a subject access request (SAR).

## 2 Responsibilities

The school's nominated person is responsible for handling all SARs, the application and effective working of this procedure and for reporting to the data subject.

## 3 Data Subject Access Request Procedure

The GDPR clarifies that the reason for allowing individuals to access their personal data is so that they are aware of and can verify the lawfulness of the processing.

The school must provide a copy of the information free of charge unless the request is manifestly unfounded or excessive, particularly if it is repetitive. The fee must be based on the administrative cost of providing the information.

Information must be provided without delay and at the latest within 28 days of receipt.

Star Primary School will be able to extend the period of compliance where requests are complex or numerous. If this is the case, Star Primary School must inform the individual of the receipt of the request and explain why the extension is necessary.

Where requests are manifestly unfounded or excessive, in particular because they are repetitive, the school can:

- Charge a reasonable fee taking into account the administrative costs of providing the information
- Refuse to respond

When a request is refused, the School must explain why to the individual, informing them of their right to complain to the Information Commissioner's Officer (ICO) and to a judicial remedy without undue delay and at the latest within one month.



### 3.1 Request for Personal Data

SARs may be received via a variety of methods including email, letter, telephone or in person. Any request from an individual for personal information will be treated as a SAR. Whilst the school cannot insist upon the completion of a SAR form (See Appendix 1 for an example SAR form), data subjects should be directed to complete and submit a form as this will aid the fulfilment of the request.

### 3.2 Verification of Identity

The requester will be asked to verify their identity by providing acceptable documentation. One item from list A and one item from list B is required.

List A	List B
Photographic proof of identification	Proof of address
Passport	Bank Statement
Photographic Driving License	Utility Bill

The requester should present the identification documents in person to the school promptly. The documents will be verified and the request will move to the fulfilment stage.

Under no circumstances should information be disclosed to anybody prior to their identity being verified.

### 3.3 Fulfillment of Request

The School's nominated persons ([Lisle Von Buchenroder](#), [Gemma Williams](#), [Claire Barracks](#) and [Matthew Norton](#)) will review the SAR in conjunction with the Information Asset Register to ascertain whether or not personal data is being processed by the school.

The School's nominated person will liaise with the relevant information asset owners in order to collate the required information.

Original documents are not required to be provided. A copy can be provided or multiple documents containing personal information can be transposed into a single document.

Any personal information relating to data subjects not named in the SAR, must be redacted.

If the request is made electronically, the school should provide the information in a commonly used electronic format. Personal information can also be provided in paper formats.

The GDPR does not include an exemption for requests that relate to large amounts of data, but the School may be able to consider whether the request is manifestly unfounded or excessive.



### **3.4 Recording of Request**

In order to determine if a request can be deemed to be repetitive, records of SARs will be kept. This record in itself will be subject to any future SARs and should be retained in line with the School retention schedule.

### **4.0 Compliance**

All staff are expected to comply with the School's policies to the highest standards. If any School employee is found to have breached this policy, they may be subject to the School disciplinary procedure. If a criminal offence is considered to have been committed, further action may be taken to assist in the prosecution of the offender(s).



**Appendix 1 – Example SAR Form**

**Application to receive Personal Information held by **Star Primary School****

Please complete in **BLOCK CAPITALS** if handwritten

<b>Section 1 – The Request</b>		
<b>I am the person the information is about</b>	<input type="checkbox"/>	if yes, please tick and then complete Sections: 3, 4, 5 and 6
<b>OR</b>		
<b>I am acting on behalf of someone else</b>	<input type="checkbox"/>	if yes, please tick and then complete Sections: 2, 3, 4, 5 and 6

<b>Section 2 – The Information requested is about someone else</b>			
<b>I am the child’s parent</b>	<input type="checkbox"/>	I enclose proof of parental responsibility	
<b>The child is over the age of 13</b>	<input type="checkbox"/>	I enclose consent to share from the child	
<b>OR</b>			
<b>I am the personal representative for a deceased person</b>	<input type="checkbox"/>	I enclose evidence of this	
<b>I am requesting the information on behalf of someone else</b>	<input type="checkbox"/>	I enclose a consent to share form	
<b>If you are requesting information on behalf of someone else, please give YOUR details below:</b>			
<b>Full Name:</b>		Relationship to data subject:	
<b>Contact Number:</b>		Email Address:	
<b>Postal Address:</b>			



<b>Section 3 – Who is the Person that the information relates to? (The 'Data Subject')</b>					
<b>Title:</b>		First Name:		Surname:	
		Maiden Name:		Other Names:	
<b>Date of Birth:</b>		Contact Number:		Email Address:	
<b>Postal Address:</b>					

<b>Identification Documents - please select one from each section</b>			
<b>Category 1: Photographic Proof of Identification</b>		<b>Category 2: Proof of Address</b>	
<b>Passport</b>	<input type="checkbox"/>	Bank Statement	<input type="checkbox"/>
<b>Driving Licence</b>	<input type="checkbox"/>	Utility Bill	<input type="checkbox"/>
<b>Other</b>	<input type="checkbox"/>	Other	<input type="checkbox"/>
<b>If other please state what equivalent is being supplied:</b>		<b>If other please state what equivalent is being supplied:</b>	

<b>Section 4 – Details of the information being requested</b>
<b>Please help us deal with your request quickly and efficiently by giving as much detail as possible about the information you would like</b>



<b>Section 5 – Access to the Information</b>
<b>How would you prefer to receive your information?</b>
<b>If you have any special needs when viewing information please state here</b>

<b>Section 6 – Declaration</b>								
<p><b>I certify the information provided on this form is true.</b>  <b>I understand [School Name] is not obliged to comply with my request unless they are supplied with such information as they may reasonably require in order to satisfy themselves as to:</b></p> <ul style="list-style-type: none"> <li>• my identity and</li> <li>• to locate the information which I seek</li> </ul>								
<table border="1"> <tr> <td><b>Name</b></td> <td> </td> <td><b>Date</b></td> <td> </td> </tr> <tr> <td><b>Signature</b></td> <td> </td> <td> </td> <td> </td> </tr> </table>	<b>Name</b>		<b>Date</b>		<b>Signature</b>			
<b>Name</b>		<b>Date</b>						
<b>Signature</b>								
<p><b>Warning – a person who unlawfully obtains, or attempts to obtain, personal information is guilty of a criminal offence and is liable to prosecution</b></p>								

<b>Once the Form is Complete:</b>	
<b>Send this completed form to:</b>	Lisle Von Buchenroder / Gemma Williams / Claire Barracks / Matthew Norton Star Primary School Canning Town London E16 4NH Or: <a href="mailto:consent@star.newham.sch.uk">consent@star.newham.sch.uk</a>
<b>For queries, please contact: <a href="mailto:consent@star.newham.sch.uk">consent@star.newham.sch.uk</a></b>	
<b>Telephone:</b>	020 7476 5336
<b>Email:</b>	<a href="mailto:consent@star.newham.sch.uk">consent@star.newham.sch.uk</a>
<b>Data Protection: The information included on this form will be used for the purpose of handling your subject access request and will not be kept longer than is necessary to do so.</b>	
<b>Please Note: If your Subject Access Request relates to a deceased person’s personal information, you are advised to contact us in order that we can advise you of the process for requesting this type of information.</b>	

Template 'data sharing decision' form



Name and position of person requesting data:	
Date request received:	
Data requested:	
Purpose:	
Decision:	
Data supplied:	
Reasons for disclosure or non-disclosure:	
Any specific arrangements regarding retention/deletion of data:	
Decision taken by (name and position):	
Date of disclosure:	
Signed:	
Dated:	