

# Swallownest Primary School

## Subject Access Request Policy



**Approved by:** Leyton McHale

**Date:** May 2018

**Last reviewed on:**

**Next review due by:** May 2020

**DPO:** Tim Pinto – [tpinto@esafetyoffice.co.uk](mailto:tpinto@esafetyoffice.co.uk)



SWALLOWNEST PRIMARY SCHOOL

Vision

*We want the best for and the best from everyone in our learning community*

Mission

To be recognised as an  
outstanding provider of education

Strategic  
Pillars

Attainment &  
Progress



Leadership



Teaching



Targeted  
Budgeting/  
Funding



We will provide a safe and secure environment with children at the heart of everything we do

We will provide the best education for our children – in return we expect them to work hard and behave well

Values

We will provide the best support for adults in their careers – in return we expect adults to work very hard for the children in their care and for themselves, ensuring professional behaviour helps the school to build a **GOLD standard** reputation.

We will provide the best support for parents and carers to ensure they are able to provide safe and happy home environments for their children – in return we expect them to support their children and support the school to provide a 'team' approach to ensuring **GOLD standard** outcomes for our children.

## ***Policy for Subject Access Requests (SAR's)***

This document sets out Swallownest Primary School's policy for responding to "subject access requests" under the General Data Protection Regulations (GDPR).

A subject access request is a written request for personal information (known as personal data) held about you by Swallownest Primary School. Generally, you have the right to see what personal information we hold about you or your child.

The GDPR gives individuals the right to know what information is held about them. It provides a framework to ensure that personal information is handled properly. However, this right is subject to certain exemptions that are set out in the GDPR.

The GDPR works in two ways. Firstly, it states that anyone who processes personal data must comply with eight principles, which make sure that personal data is:

- Fairly and lawfully processed
- Processed for specific and lawful purposes
- Adequate, relevant and not excessive
- Accurate and up to date
- Not kept for longer than is necessary
- Processed in line with the individuals' rights
- Secure
- Not transferred to other countries without adequate protection

Secondly, it provides individuals with important rights, including the right to find out what personal data is held on computer and most paper records.

Personal data will cover basic details and will include details such as name, address, telephone number, trade union membership and information held about that person in files etc.

When we receive a subject access request we will first check that we have enough information to be sure of your identity. Often we will have no reason to doubt a person's identity, for example, if we have regularly corresponded with them. However, if we have good cause to doubt your identity we can ask you to provide any evidence we reasonably need to confirm your identity.

We will gather any manual or electronically held information (including emails) and identify any information provided by a third party or which identifies a third party. If we have identified information that relates to third parties, we will write to them asking whether there is any reason why this information should not be disclosed. We do not have to supply the information to you unless the other party has provided their consent or it is reasonable to do so without their consent. If the third party objects to the information being disclosed, we may seek legal advice on what we should do.

Swallownest Primary School has one month to respond to a request for access to personal information from the date a verified request is received (i.e. SAR form and acceptable copies of identification). We may extend this by up to two months where a request is complex or where the request involves multiple data subjects.

If we require an extension, we will inform you as soon as possible and no later than one month following receipt of the request. We will also inform you why the extension is required.

It may be necessary to redact certain details from the information which is provided in response to your Subject Access Request, such as third party information. You can find more information on the type of details which will be redacted on the following link:

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

If you are unsatisfied with redactions made to the information provided you are entitled to ask for a review of the decision.

Under the new GDPR, in most cases you will not be charged for the subject access request. However, we may charge a 'reasonable fee' where a request is manifestly unfounded (e.g. excessive or repetitive). In cases where the request is repetitive we may also refuse to respond. We may also charge if you are requesting additional copies of information which has already been provided.

This will be assessed on a case by case basis and if we feel it is necessary to charge for the provision of information we will contact you prior to proceeding with your request.

If you have reason to believe that there are specific documents missing from your disclosure, it will help us investigate if you can provide us with more information regarding these documents.

If we agree the information is inaccurate, we will correct it and where practicable, destroy the inaccurate information. If we do not agree or feel unable to decide whether the information is inaccurate, we will make a note of the alleged error and keep this on file.

If you are not satisfied by our actions, you can seek recourse through our internal complaints procedure. If you remain dissatisfied, you have the right to refer the matter to the Information Commissioner. The Information Commissioner can be contacted at:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Tel 01625 545745