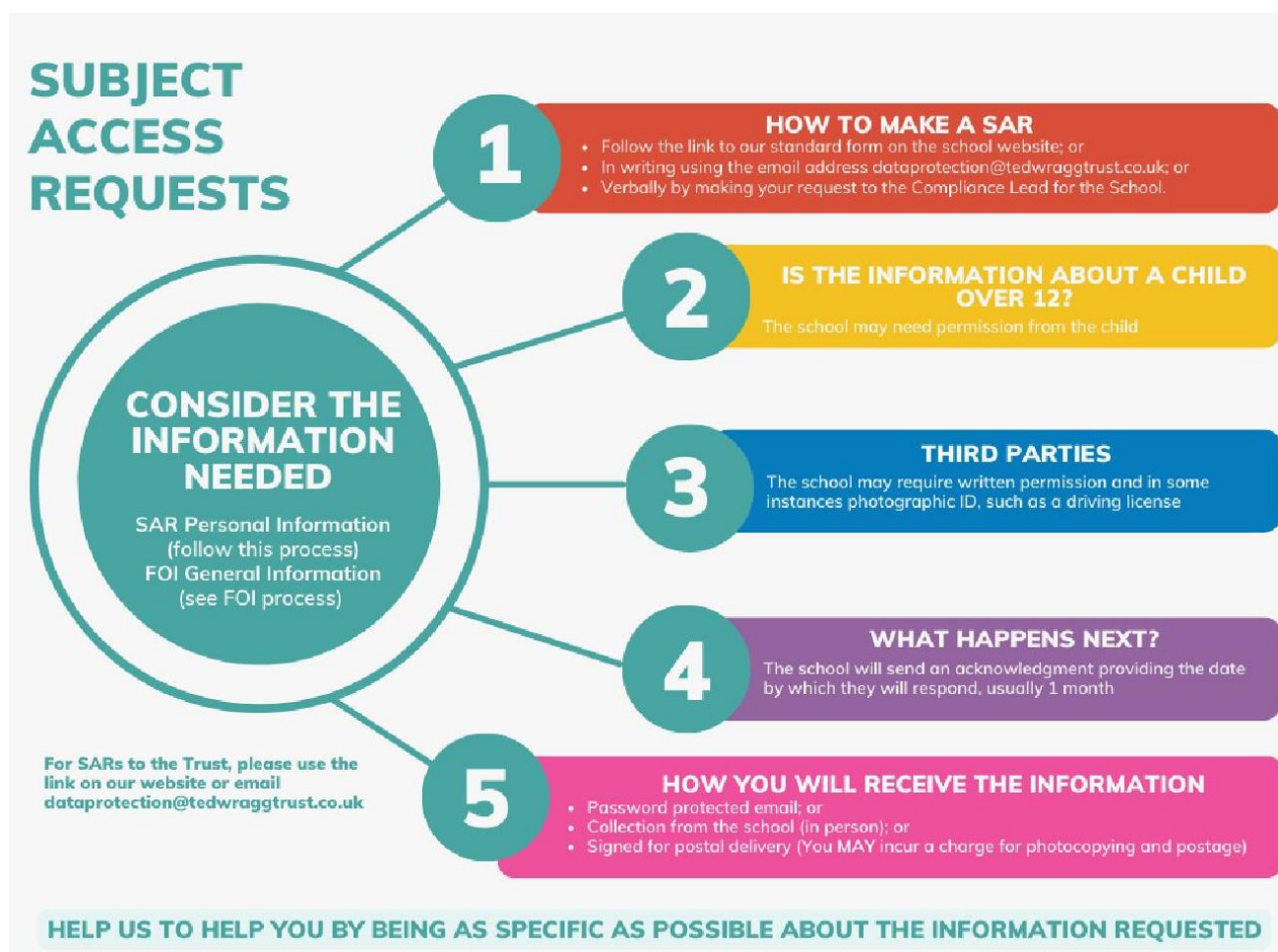


APPENDIX B - HOW TO MAKE A SUBJECT ACCESS REQUEST:

A GUIDE FOR PARENTS / PRIORITY CONTACTS

Process Map – How to make a SAR



What is a SAR?

A SAR or Subject Access Request is a formal request to view or receive copies of the information which we hold on a living person. For schools, this can be information on pupils/parents/priority contacts. The request is handled in line with the Data Protection Act 2018 and the UK GDPR requirements.

What type of information are you requesting in your SAR?

When requesting a SAR, it is important that you are clear which exact records you want to see or receive copies of. These can include things such as:

- school reports
- school work

- external reports (such as psychologists or other services)
- communications e.g. letters, e-mails
- performance data - internal monitoring information

If you are not clear what documents you are requesting, then this may slow down the Trust or the school's ability to provide you with the information you want.

What should the SAR include?

You should include:

1. A clear label for your request (e.g. use 'subject access request' as your email subject line or a heading for your letter);
2. The date of your request;
3. Your name (including any aliases, if relevant);
4. Your up-to-date contact details;
5. A comprehensive list of what personal data you want to access, based on what you need; any details, relevant dates, or search criteria that will help the organisation identify what you want; and
6. How you would like to receive the information (e.g. by email or printed out).

Don't include:

1. Other information with your request, such as details about a wider complaint; a request for all the information the school holds on you, unless that is what you want (if the school holds a lot of information about you, it could take them longer to respond); or
2. threatening or offensive language.

Should I use the Trust or school's standard form?

To assist you with your request and to ensure we receive the correct information to progress your SAR, the Trust and the school have created a standard form for completion which can be found on our respective websites. Standard forms are not compulsory but we would ask you to use ours. Standard forms can make it easier for us to deal with your subject access request. They help:

- structure your request;
- prompt you to include necessary details and supporting documents; and
- let you know the best contact point at the school/Trust.

Links to the standard forms

To ensure this process is made easy, please use the link on either the Trust or school website so that your SAR is made directly to the Data Protection Officer.

All Saints CofE Academy	Data Protection Officer
Cranbrook Education Campus	Data Protection Officer
Exwick Heights Primary School	Data Protection Office
Honiton Community College	Data Protection Officer
ISCA Academy	Data Protection Officer
Lipson Co-operative Academy	Data Protection Officer
Marine Academy Primary	Data Protection Officer

Marine Academy Plymouth	Data Protection Officer
Matford Brook Academy	Data Protection Officer
Queen Elizabeth's School	Data Protection Officer
Sidmouth College	Data Protection Officer
St James School	Data Protection Officer
St Luke's CofE School	Data Protection Officer
West Exe School	Data Protection Officer
Whipton Barton Federation	Data Protection Officer
Ted Wragg Multi-Academy Trust	Data Protection Officer

Can I make a SAR verbally?

Yes. You can make a subject access request verbally, however, we recommend you put it in writing by using the school link to ensure you have a record of your request logged with the DPO. If you are making a verbal request, try to:

- use straightforward, polite language
- focus the conversation on your subject access request;
- discuss the reason for your request, if this is appropriate
- work with us to identify the type of information you need and where it can be found;
- If you are asking for very specific information; check the school's understanding
- ask the school to briefly summarise your request and inform them if anything is incorrect or missing before finishing the conversation.

If you make your request verbally, we recommend you make this to the Compliance Lead for the school or Trust and follow this up in writing (e.g. by letter, email or by using our standard form).

Can someone else make a request on my behalf?

Yes, you can authorise someone else to make a subject access request for you. However, you should consider whether you want the other person to have access to some or all of your personal information. Depending on the nature of your request, the other person could gain access to information that you may not want to share with them, such as medical history. Examples of individuals making requests for other people include:

- someone with parental responsibility, or guardianship, asking for information about a child or young person;
- a person appointed by a court to manage someone else's affairs
- a solicitor acting on their client's instructions; or
- a relative or friend that the individual feels comfortable asking for help.

When we receive the request, we need to be satisfied that the other individual is allowed to represent you. We will usually ask for formal supporting evidence to show this, such as written authorisation and your photographic ID, such as a driving license. It is the other person's responsibility to provide this when asked to do so.

What if my child is over 12 years of age?

In most cases, children over 12 are capable of making their own SARs. If a request is made for personal data about a child 12 years or older, the Compliance Lead at the School will usually require permission from the child first. We process children's information necessary for our education provision, children over the age of 12 years of age have a right to ask for copies of their personal data.

Should I keep a record of my request?

If you are not using the link to our standard form to request this information, and it is made in writing, we strongly recommend that you keep a copy of any documents or written correspondence for your own records. If the request is made verbally, we recommend you keep key details, such as:

- the date and time of your request;
- the location;
- the name and contact details of the person you interacted with
- any other relevant information.

This will provide helpful evidence if you wish to:

- follow up your request;
- raise concerns; or complain about our response, at a later stage.

How long does a SAR take?

The law states that we have one calendar month (30 days) from the day your request is received in which to respond to the request. However, if the request is complex then we can lawfully extend this for up to an additional two months. In addition, we can extend this period to two months when the SAR is received outside of term time.

Is there a charge for a SAR?

As a rule - no. The law states that we should provide this service free of charge where possible. But, we can make a charge if we believe that the request is excessive, vexatious or has no basis. Any charge we would make would only be to cover any costs incurred.

Can anyone request a SAR on a child?

No. Only those with a legal right to do so may request information on individuals. In the case of a child, this is limited only to those who have parental responsibility (which is usually the birth mother and father unless this has been removed by a court).

If I have any questions, who can I ask?

Staff at the school have all been trained on data management. However, if you have any specific questions, please email dataprotection@tedwraggtrust.co.uk who will respond to your enquiry.

What is our process for responding to a SAR?

1. Once your request is received, you will receive confirmation from the Trust or School. This will confirm the time-lines involved and provide you with the information that is

relevant to your needs. The Compliance Lead for either the Trust or School will (usually) contact you by email. This is to ensure that there is a clear administrative trail for the management of the request. However, if those requesting want a response in writing, then this will be undertaken

2. The DPO and the school will review and coordinate the request. You will then receive a written response which will state
 - (a) that your request has been accepted
 - (b) that your request has been refused or
 - (c) that we need more information. In each case, the letter will outline what the next steps are for you as well as the basis the decision has been made on.
3. The final communication will state when and how the documents will be made available for you - such as password protected e-mail, collection by hand or by signed-for post.

Why we might need to request more information on you

Before we agree to issue any information we may request proof of entitlement. This may be a birth certificate, court order (where already in existence) or evidence of personal identity such as a passport or driving licence. We are not being 'difficult' when we do this - we have a legal duty to ensure that those having access to personal data have a legal basis for doing so. The protection and well-being of our children is our utmost priority.

Contact

If you would like to discuss anything within this guidance document or have any concerns, we request that you raise them with the Headteacher of the School or by emailing the Trust at dataprotection@tedwraggtrust.co.uk

We have appointed a Data Protection Officer (DPO) to oversee compliance with data protection. If you have any questions about how we handle your personal information which cannot be resolved by the School or Trust, then you can contact the DPO on the details below:

Data Protection Officer: Judicium Consulting Limited

Address: 72 Cannon Street, London, EC4N 6AE

Email: dataservices@judicium.com

Web: www.judiciumeducation.co.uk

If dissatisfied with the SAR response you have the right to make a complaint at any time to the Information Commissioner's Office, the UK supervisory authority for data protection issues at <https://ico.org.uk/concerns>