









Subject Access Request Policy

#### **POLICY**

This policy has been adopted on behalf of all academy schools in The New Guild Trust:

Moorpark Junior School Jackfield Infant School Alexandra Junior School Alexandra Infants' School

### **Approval and Review**

Committee to Approve Policy	Trust Board				
Date of Board / Academy Committee Approval	Dec 2025				
Chair of Board / Academy Committee	Mrs L Eagle				
Signature	L Eagle				
Accounting Officer	Mrs K Peters				
Signature	% Peters				
Policy Review Period	12 months				
Date of Policy Review	Dec 2026				

Version	Date	Changes	Reason for Alterations (From and				
	Approved		To)				
V1	Dec 2020		Initial policy				
	Dec 2021	No changes					
	Dec 22	Request made to school	Updated with DPO recommendations				
	Dec 23	No Changes					
	Dec 25	No Changes					

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#### **Subject Access Requests (SAR)**

Any individual, person with parental responsibility or young person with sufficient capacity has the right to ask what data the school/academy holds about them and can make a Subject Access Request (SAR).

A SAR can be made using the 'Subject Access Request' form (Appendix A).

The CFO of the Trust has been designated as the person who will coordinate the response to a SAR, with support from the DPO.

The school is required to provide the individual with the data it holds on them within one calendar month. The school can extend the time to respond by a further two months if the request is complex or they have received a number of requests from the individual. The individual must be contacted within one month of the school receiving their request and explain why the extension is necessary.

The response to the SAR will be provided in an electronic form.

It is permissible to ask the individual who has made the request to be more specific about the information that they require in order to ensure that the information they are provided with meets their requirements rather than providing lots of information that may not be relevant to their query.

Evidence of the identity of the person making the request and their relationship to the pupil must be gained prior to any disclosure of information. This should be recorded on the SAR Log (Appendix B).

Exemptions to a SAR may include:

- Education, Health, Social Work records
- Examination marks and scripts
- Safeguarding records
- Special educational needs
- Parental records and reports
- Legal advice and proceedings
- Adoption and Court records and/or reports
- Regulatory activity and official requests e.g. DfE statistical information
- National security, Crime and taxation
- Journalism, literature and art
- Research history, and statistics
- Confidential references

For full details of exemptions to a SAR please visit the ICO website: <a href="https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/exemptions/">https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/exemptions/</a>

# Appendix A

# Subject Access Request (SAR) Form

son whose information you are requesting)
Evidence Provided? Yes / No Details:
Data Subject: Yes / No Parent or person with parental responsibility: Yes / No Other: Yes / No If you have selected 'yes' for 'Other', please outline your role here:
equest

Option i	
equested about me.	, hereby request that <mark><school academy=""></school></mark> provide the data
Signed:	Date:
Option ii	
	, hereby request that <mark><school academy=""></school></mark> provide the data (insert child's name) on the basis of the
Signed:	Date:

# Appendix B

# Subject Access Request (SAR) Log

Data Subject	Request	Date of SAR	Date DPO notified	ID confirmed	Response Deadline	Extension to Deadline?	Data held by school	Any additional info from requestor?	Any info to be withheld?	Who auth'd with-holding info?	Response checked and approved by DPO
Smith	All data held about this staff member	01/02/18	01/02/18	Passport seen 02/02/18	01/03/18	08/03/18: 1 week due to Feb ½ term.	Personnel file – hard copy Email correspond ence about individual	JS clarified the request links to a grievance they have with their line manager	Redacted email correspond ence to remove reference to other employees	DPO 20/02/18	DPO 01/03/18