

## GDPR Subject access request process -

The right of access, commonly referred to as subject access, gives individuals the right to obtain a copy of their personal data as well as other supplementary information. It helps individuals to understand how and why you are using their data, and check you are doing it lawfully.

In schools, this right is exercised most frequently by parents, but a request could come from anyone whose information is being used by the school. This could include pupils, staff or other individuals.

A valid subject access request should normally be dealt with in a timescale of no more than 30 calendar days, so requests for information must be acted on quickly and referred through to the correct channels immediately to prevent delay.

Not all requests for information need to be dealt with as a subject access request, if the request is only for access to a pupil's "Education Record" (the information usually held as a central file within the school office) then this information should be disclosed within a shorter timescale (15 days), although this is not statutory for academies.

### Receiving and recognising a request

- Determine whether request is valid
- Forward to headteacher and Data Protection Officer

Staff  
in  
school

### Acknowledgement of request

- Written response to explain process to individual making request
- Seek clarification if necessary on information requested

DPO

### Collation of personal data

- Consult Information Asset Register to establish location of personal data in school
- Contact third party processors to request any data that may be being processed outside of school

Staff  
in  
school

### Review and redaction

- Ensure documents are redacted to prevent the disclosure of personal data of other individuals

DPO

### Confirmation of request completion and disclosure

- Written notification to the individual informing that the request is ready for collection/delivery
- Disclosure of information to individual

## Step 1 - Receiving and recognising a Subject Access Request

A request to access personal data does not need to state the words “Subject Access Request” and can be submitted in many forms. At Stowlawn Primary School, subject access requests may be received through the following routes:



### Letter (by post)

- scan a copy of the letter
- copy to the Headteacher
- email a copy to the Data Protection Officer DPO



### Email

- Forward to :
- Headteacher
- email a copy to the Data Protection Officer DPO



### Message via social media

- Check the request includes a proper name and contact details for the person making the request
- You may need to reply to the message to obtain contact information



### Phone call

- Transcribe the request
- Ensure you have contact details for the person making the request as we will need to respond (this can be a postal address or an email address)
- Guide them to the request form on the school website if this is easier for them, or they need more time to think about what they want to request



### Verbally (school Reception)

- Transcribe the request
- Ask the individual for a contact address
- Ask the individual to review what you have written down and add or amend
- Guide them to the request form on the school website if this is easier for them, or they need more time to think about what they want to request

### Online Request Form (school website)

- [\(Insert link to website form\)](#)

## **Step 2. Acknowledgement of the request**

The Data Protection Officer will advise on how best to acknowledge the request. This judgement will be based on the nature of the information requested and whether any further clarification is required in order to proceed with the request.

An acknowledgement will normally be sent in the form of a letter, but may also be via an email or message dependent on the medium used to submit the original request. Acknowledgements should not be made verbally.

## **Step 3. Collation of personal data**

The Data Protection Officer will advise staff on where to look for the personal data requested. The location of personal data will be identified by the school's Information Asset Register (IAR).

Staff may be asked to search through archive records or emails (including deleted items where available) to locate personal data in relation to the request.

Copies of electronic files and paper records should be made ready for inspection / redaction.

If the request proves to require an extensive, excessive or unfounded amount of effort to collate records, then the Data Protection Officer may ask to extend the timescale for responding.

## **Step 4. Review and Redaction (preparing records for disclosure)**

The Data Protection Officer will advise on how to appropriately redact any records that are suitable for disclosure

Not all records may be released in the disclosure, but all records containing personal data should be reviewed

The Data Protection Officer will advise on which records should be included in the final disclosure "pack".

## **Step 5. Disclosure**

The individual who has made the request will be contacted to confirm the process is complete and arrange for collection / delivery of the disclosure pack.

If the disclosure pack is collected from school, this should be done by the individual who has made the request in person and signed for on collection.

If the disclosure pack is delivered by post, then the school should check the address used is correct prior to posting and send using a "signed for" delivery service.