VILLAGE INFANTS SCHOOL
DATA PROTECTION
SUBJECT ACCESS PROCEDURE

This procedure is to formally set out the guidelines which must be adhered to for all requests when an individual wants to see a copy of the information the School hold about them.

All requests should be made in writing to the Data Protection Officer at dpo@village.bardaglea.org.uk

Subject Access Requests (SAR)

What is a valid subject access request?

For a subject access request to be valid, it should be made in writing. The following should also be considered when considering validity:-

- A request can be sent by email, in hard copy or via social media. A request cannot be made verbally, and it is good practice to explain to the individual how to make a valid request rather than ignoring them.
- If someone finds it impossible or unreasonably difficult to make a subject access request in writing, you may have to make a reasonable adjustment for them under the Equality Act 2010. This could include treating a verbal request for information as though it were a valid subject access request. You might also have to respond in a format which is accessible to a disabled person, such as Braille, large print, email or audio formats. If an individual believes you have failed to make a reasonable adjustment, they may make a claim under the Equality Act or it may be appropriate for the individual to view the information on site.
- The request does not need to mention the General Data Protection Regulations, Data Protection Act or the fact that it is a subject access request if the individual is asking for their own personal data.
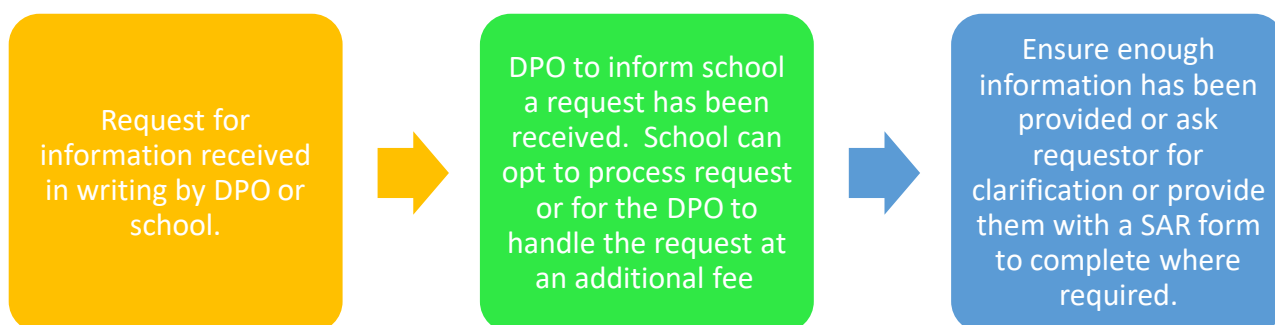
Information required before responding

1. Full details of information required and completion of the appropriate Subject Access Request form where required.
2. If you are unsure of the identity of the individual making the subject access request you must ask for Proof of identity – birth certificate, passport, driving licence, utility bill. Name, current address and date of birth must be proven so you may need more than one proof of identity document.
3. Consent from age 12 and up – All children who are aged 12 and above must give written consent for their information to be released.
4. Proof of Parental Responsibility – If mother of child this would be automatically assumed along with her identification. Father must provide either a marriage certificate dated before the child

is born, birth certificate where father is named, PR agreement with the mother or a PR order from the Court.

5. Parental consent for children under 12.
6. In the case of a solicitor requesting information for ongoing legal proceedings written consent must be provided.
7. Copy of disclosed documents to be kept on a secure system.
8. It is not acceptable to amend or delete data to prevent its disclosure.
9. When a SAR is received for an educational record a response must be provided within 15 school days. For any other request a response must be provided within one calendar month wherever possible. If this time limit cannot be met, then the requestor must be informed.

SUBJECT ACCESS REQUEST (SAR) PROCEDURE FLOW CHART

Request for information received in writing by DPO or school.

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DPO to inform school a request has been received. School can opt to process request or for the DPO to handle the request at an additional fee

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Ensure enough information has been provided or ask requestor for clarification or provide them with a SAR form to complete where required.

Request is checked to ensure it contains the following:-

- Full name, address and date of birth of applicant

- Proof of identity (where required)

- Application provides enough data to identify where the records are being held

Acknowledgement letter/email to be sent to requester. Clarify request if necessary

Collate information and prepare response.

Consult DPO if required. Application must be completed within 15 school days if a pupil's educational record has been requested and one calendar month for other requests wherever possible.

All correspondence must be kept on file for 2 years and then deleted.