



**Love Care Respect**

***To aspire to being outstanding in everything we do, by always aiming higher.***

**"Let your light shine in all you say and do."**

***Matthew 5:16***

## Subject Access Request (SAR) Policy and Procedure

### **1 Introduction and Purpose**

- 1.1 The UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA) give individuals the right to access personal data held about them by Wylve Valley Church of England Voluntary Aided Primary School, Cherry Orchard, Codford, Warminster, BA12 0PN (the "school").
- 1.2 Subject access is a key right under data protection law and provides individuals with transparency and control over their personal information. It also helps the school maintain trust by ensuring that data is accurate, complete, and processed lawfully.
- 1.3 Personal data means any information relating to a living individual who can be identified, directly or indirectly, from that information. Some personal data is classed as *special category data* (e.g. information about health, ethnicity, or safeguarding) and requires additional protection.
- 1.4 The school is the *Data Controller* for the personal data it processes in the course of its educational and administrative functions.
- 1.5 The school's *Data Protection Officer (DPO)* is responsible for overseeing compliance with data protection law and ensuring that Subject Access Requests (SARs) are handled lawfully, fairly, and within statutory time limits.

## **2 Policy Statement**

- 2.1 The school recognises the importance of transparency and accountability in handling personal data and is committed to meeting its obligations under the DPA and UK GDPR.
- 2.2 This policy ensures that individuals can exercise their right of access effectively and that the school responds to all SARs in accordance with the law.
- 2.3 The school is committed to:
  - Establishing clear and efficient procedures for handling SARs;
  - Maintaining transparency regarding the personal data it holds and processes;
  - Responding to all SARs within one month of verification, or within an extended period of up to two further months where requests are complex or numerous;
  - Ensuring that all personal data, regardless of the format in which it is held (electronic, paper, audio, CCTV, etc.), is covered by this policy.

## **3 Scope of the Policy**

- 3.1 This policy applies to all Subject Access Requests received by the school, regardless of the requester's relationship with the school. This includes requests from pupils, parents and carers, staff, former staff, governors, job applicants, contractors, and volunteers.
- 3.2 The policy outlines how SARs are received, verified, processed, and fulfilled, and how the school ensures compliance with the DPA and UK GDPR.
- 3.3 Requests for information about deceased individuals fall outside the scope of data protection legislation and may be handled under the *Freedom of Information Act 2000* or other applicable legislation.
- 3.4 Requests for access to a child's *educational record* may also fall under the *Education (Pupil Information) (England) Regulations 2005*, and applicants will be informed where this applies.

## **4 What is a Subject Access Request?**

- 4.1 A Subject Access Request (SAR) is a request made by, or on behalf of, an individual for access to their personal data as set out in Articles 12 and 15 of the UK GDPR.
- 4.2 A request does not need to refer to "Subject Access" or cite legislation to be valid. Any written or verbal request that clearly seeks access to personal data will be treated as a SAR.
- 4.3 Requests may be made:
  - In writing (e.g. letter, email, or completed SAR form);
  - Verbally (in person or by telephone), in which case the school will record the details and confirm them with the requester before proceeding.
- 4.4 A SAR entitles an individual to:
  - Confirmation that their personal data is being processed;
  - Access to copies of that data;
  - Information about the purposes of processing, the categories of data held, and any recipients of the data;
  - Details of the data's source (if not collected directly from the individual);
  - Information on how long the data will be retained and their rights regarding correction, erasure, or complaints.
- 4.5 If a request is made electronically, the school will respond in a commonly used electronic format unless another format is requested.

## **5 Formal Requirements**

- 5.1 The school encourages SARs to be made in writing for clarity, but verbal requests are also valid.
- 5.2 A *Subject Access Request Form* is available to assist individuals, but is not mandatory. (**See Appendix A**)
- 5.3 The school must verify the identity of the requester before disclosing any personal data. Acceptable forms of ID include official documents such as a passport, driving licence, or utility bill.
- 5.4 The statutory one-month response period begins once the school has verified identity and clarified the scope of the request (if necessary).
- 5.5 All SARs are free of charge. However, a reasonable administrative fee may be charged for requests that are manifestly unfounded, excessive, or repeated.

## **6 Subject Access Procedures**

- 6.1 All SARs must be reported immediately to the DPO upon receipt.
- 6.2 Staff should not respond directly to a SAR but must pass it to the DPO, who will coordinate the response with the headteacher and relevant staff.
- 6.3 If clarification is required to identify the requested information, the school will seek it promptly, although such clarification should not be used to delay the process unnecessarily.
- 6.4 The DPO will maintain a *SAR Log* containing:
  - Date of receipt and verification;
  - Nature of the request;
  - Departments involved;
  - Dates of response and any extensions;
  - Details of exemptions or redactions applied.
- 6.5 Data will be reviewed carefully before disclosure, and any redactions or exemptions applied will be approved by the DPO.
- 6.6 Responses will be provided securely (e.g. via encrypted email, password-protected file, or recorded delivery).

## **7 Requests Made on Behalf of Others**

- 7.1 Individuals may authorise a representative, such as a solicitor, to act on their behalf when making a SAR.
- 7.2 The school will require written authorisation or other proof of legal authority (e.g. power of attorney or parental responsibility) before releasing any data to a third party.
- 7.3 The DPO and headteacher must review all third-party requests before data is disclosed.

## **8 Requests for Information About Children**

- 8.1 Children have the same right of access to their personal data as adults.
- 8.2 Where a parent or carer requests on behalf of a child, the school must consider the child's age, level of maturity, and ability to understand their rights.
- 8.3 Generally, children aged 12 or above are presumed capable of exercising their own data protection rights, although this will be assessed on a case-by-case basis.
- 8.4 The school will act in the child's best interests when deciding whether to disclose personal data to a parent or carer.
- 8.5 Requests may also fall under the *Education (Pupil Information) (England) Regulations 2005*, which govern access to educational records.

## **9 Redacting Information and Exemptions**

- 9.1 Certain information may be withheld or redacted where disclosure would adversely affect the rights and freedoms of others or where an exemption applies.
- 9.2 Relevant exemptions under the DPA and UK GDPR may include:
- Personal data identifying third parties (unless consent is obtained);
  - Confidential references given by the school;
  - Examination scripts and marks prior to official release;
  - Data processed for the prevention or detection of crime;
  - Management forecasting or negotiations;
  - Information likely to cause serious harm to the physical or mental health of any individual.
- 9.3 The DPO must approve all exemptions and redactions to ensure consistency and legal compliance.
- 9.4 Redactions will be limited to what is strictly necessary to protect others while maintaining the context of the disclosed information.

## **10 Viewing Data in Person**

- 10.1 In some cases, the school may invite an individual to view their information on-site, subject to DPO and headteacher approval.
- 10.2 Visits will be documented, and the same security and confidentiality standards will apply.
- 10.3 Viewing information in person does not remove the individual's right to receive a copy of their personal data.

## **11 Roles and Responsibilities**

- 11.1 All staff are responsible for recognising SARs and reporting them immediately to the DPO.
- 11.2 The headteacher has overall responsibility for ensuring compliance with this policy and supporting the DPO in handling SARs.
- 11.3 The DPO oversees SAR processing, provides advice and training, approves redactions and exemptions, and ensures compliance with statutory timeframes.
- 11.4 Staff must cooperate with the DPO in locating, reviewing, and providing relevant information when requested.

## **12 Refusing a Request**

- 12.1 The school may refuse a SAR if it is manifestly unfounded or excessive.
- 12.2 If a request is refused, the school will:
- Explain the reasons for refusal in writing;
  - Inform the individual of their right to complain to the ICO or seek a judicial remedy; and
  - Record the refusal in the SAR Log.

## **13 Complaints**

- 13.1 Individuals who are dissatisfied with how their request has been handled should first contact the DPO to request an internal review.
- 13.2 If still dissatisfied, they may follow the school's complaints procedure or contact the Information Commissioner's Office (ICO) directly.
- 13.3 Complaints to the ICO should normally be made within three months of the school's final response.

## 14 Contacts

14.1 For any queries about this policy or to make a Subject Access Request, please contact:

- **The School Office:**
  - Email: [admin@wyllye valley.wilts.sch.uk](mailto:admin@wyllye valley.wilts.sch.uk)
  - Telephone: 01985 850461
  
- **The Data Protection Officer (DPO)**
  - Email: [dpo@jeremyshatford.co.uk](mailto:dpo@jeremyshatford.co.uk)

14.2 Further information and guidance are available from the:

- **Information Commissioner's Office (ICO):**

Website: <https://ico.org.uk>

Telephone: 0303 123 1113

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## 15 Appendix A

### Subject Access Request (SAR) Form

(for use under the UK General Data Protection Regulation and Data Protection Act 2018)

#### About This Form

15.1 Under the UK GDPR and Data Protection Act 2018, individuals have the right to access personal data held about them by **[Insert School Name]**.

This form is designed to help you provide the information the school needs to respond to your request quickly and accurately.

You do **not** have to use this form to make a request, but it can help avoid delays.

#### 16 Details of the Data Subject (the person the request is about)

Full name:

Telephone number:

.....

.....

Date of birth (if applicable):

Email address:

.....

.....

Address:

.....

.....

#### 17 Relationship to the school (please tick):

Current pupil

Job applicant

Former pupil

Governor/volunteer

Parent/carer

Other (please specify):

Current staff member

.....

Former staff member

#### 18 Details of the Requester (if different from above)

Name:

Address (if different):

.....

.....

Relationship to the data subject:

.....

(e.g. parent, solicitor, legal guardian)

Email / Telephone:

.....

.....

18.1 Please provide evidence of your authority to act on behalf of the data subject (for example, a signed consent form, power of attorney, or proof of parental responsibility).

#### 19 Verification of Identity

19.1 To protect personal data, the school must confirm identity before releasing any information. Please provide **copies** (not originals) of **two forms of ID**, for example:

- Passport or driving licence; and
- Utility bill, council tax bill, or bank statement (dated within the last 3 months).

## 20 Details of the Information Requested

20.1 Please describe the personal data you are requesting, including any specific documents, dates, or types of information (for example: attendance records, assessment data, safeguarding notes, staff file, or emails containing your name).

- **Details:**

.....  
.....  
.....

20.2 If possible, please specify the date range to help locate the information:

**From:** ..... **To:** .....

## 21 Format of Response

21.1 Please indicate how you would like to receive the information (tick one):

- Secure electronic copy (email / encrypted link)
- Paper copy by recorded delivery
- View in person at the school

## 22 Declaration

22.1 I confirm that the information I have provided is correct and that I am entitled to access the personal data requested under data protection law.

**Signature:** .....

**Date:** .....

22.2 If this request is being made on behalf of someone else:

**Signature of data subject (if applicable):** .....

**Date:** .....

## 23 Submitting Your Request

23.1 Please send your completed form and copies of your identification documents to:

- **The Headteacher /Data Protection Officer**  
Email: [Insert DPO Contact Email]  
Address: [Insert School Address]

23.2 The school will acknowledge your request and respond **within one calendar month** of verifying your identity and the scope of your request.

## 24 9. Further Information

24.1 If you are unhappy with how your request has been handled, you can contact the school's Data Protection Officer in the first instance.

You also have the right to complain to the **Information Commissioner's Office (ICO):**

- Website: <https://ico.org.uk>  
Telephone: 0303 123 1113

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## Subject Access Request Form for Pupils

*(Your right to see the information the school has about you)*

### 1. About this form

- 25.1 You have a legal right to ask your school what personal information it holds about you. This might include things like your school record, reports, attendance, or emails that mention you.
- 25.2 You don't have to fill in this form to make a request, but it helps the school find your information more quickly.

### 2. About You

**Your full name:**

.....

**Date of birth:**

.....

**Your class / year group:**

.....

**Address:**

.....

.....

**Email (if you have one):**

.....

### 3. What information would you like to see?

- 25.3 Please tell us what information you want. You can write about a type of record (for example, "my behaviour record" or "emails about me"), or a date or time period.

**Details:**

.....

.....

.....

- 25.4 If you can, tell us when the information was made or who it might be from:

.....

### 4. How would you like to get your information?

- I would like to get a copy by email (secure link)
- I would like to get a paper copy
- I would like to see it in person at school

### 5. Confirming it's really you

- 25.5 The school must make sure the information goes to the right person. You might be asked to show something that proves who you are — for example, a student card, passport, or something else agreed with the school.

### 6. If someone is helping you with your request

25.6 If you want your parent, carer, or someone else to help you make this request, please tell us:

**Their name:**

.....

**How they help you (for example, parent / carer / solicitor):**

.....

Please tick one box:

- I want them to make this request for me.
- I want to see the information myself, but they can help me with the process.

**Your signature (if you can sign):** .....

**Date:** .....

## 7. Sending your form

25.7 Please send this form to the school's **Data Protection Officer (DPO):**

- **Name:** [Insert DPO Name]  
**Email:** [Insert DPO Contact Email]  
**Address:** [Insert School Name and Address]

25.8 The school will write back to confirm it has received your request and will reply **within one month** after checking your identity.

## 8. If you are not happy with what happens

If you are unhappy with how your request is handled, you can:

- Speak to your school's Data Protection Officer; or
- Contact the **Information Commissioner's Office (ICO)** for advice:
  - Website: <https://ico.org.uk>
  - Telephone: 0303 123 1113

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