

## Culford School's Subject Access Request Policy (SAR)

Culford School aims to be as open as it can be in terms of giving individuals access to their personal information. An individual (data subject) can make a request to see their personal information being held, used or shared by the school through a Subject Access Request (SAR).

The School may hold records containing personal information about pupils, parents, employees, volunteers, governors, contractors and commercial customers both past and present. The information may be electronic and/or paper files. It may include such documentation as hand written notes, emails, reports, photographs, DVD and sound recordings.

Under the General Data Protection Regulation, individuals (data subjects) have the right to obtain confirmation as to whether their personal data is being processed. If personal information is being processed, they are entitled to access the following information:

- the reasons why their data is being processed;
- the description of the personal data concerning them;
- anyone who has received or will receive their personal data; and
- details of the origin of their data if it was not collected from them
- how long the personal data will be stored or criteria to determine that period

Not all personal information is covered and there are 'exemptions' and 'restrictions' within data protection regulations where the school may not be required to grant subject access. Further information on this can be found at [www.ico.org.uk](http://www.ico.org.uk).

### How to make a request

The School's Data Protection Lead is the Compliance Officer. Subject Access Requests should be in writing and addressed to the Compliance Officer at [Compliance@culford.co.uk](mailto:Compliance@culford.co.uk) or **The Compliance Officer, Culford School, Culford, Bury St Edmunds, Suffolk, IP28 6TX.**

The [www.ico.org.uk](http://www.ico.org.uk) have created clear guidance to help you prepare and submit your subject access request, if needed.

### Verification of Identity

The School will require verification of the Data Subject's identity prior to granting the request to avoid data breaches. This will usually take the form of personal identification such as a passport or driving license and/or a recent official correspondence with the data subjects address. Further security checks may be carried out at this time.

Where a SAR request is received from a third party, the School will in addition to the identity checks detailed above, require confirmation of the appropriate legal documentation or consent from the Data Subject, of the third parties authority to act on their behalf.

If the School is not satisfied the third party has the authority to make a SAR on behalf of the Data Subject, the School will inform the third party that they are unable to process the SAR and will contact the Data Subject to inform them.

### **Third Part Request**

Where a request has been made by a third party, proof of entitlement will be required. Under GDPR, only the Data Subject has a right to ask to see their own information. Children have the same rights to make a SAR as an adult. A person with parental responsibility would normally exercise those rights on behalf of a child too young to understand the nature of the request (usually meaning children under 12 years). A child of any age can also ask a parent or third party to make SAR on their behalf.

People making a SAR on behalf of the Data Subject need to demonstrate their right to do so. Documentation can be a consent form or a signed letter of permission from the Data Subject or a right of attorney.

The School may contact the Data Subject for confirmation of consent before releasing any information to ensure there is no risk of a data breach.

### **Response Time**

In adherence to the General Data Protection Regulation, the School will respond to an individual's SARs within one month of receipt. This deadline can be extended by a further two months where there are a number of requests or the request is complex. The school will contact the individual within a month of receipt, explaining why the extension is necessary.

In the event the School does not hold any information on the Data Subject, the School will respond to the SAR to this effect. Should the SAR fall within the exemption criteria, the school will respond to the SAR by setting out the nature of the exemption and give reasons why the School considers an exemption applies.

Where a SAR is received and the record is made up of exempt and non-exempt information, the School will, where practical, redact the exempt data and provide the remainder.

If an individual is unhappy with the School's management of their request, they should contact the School in the first instance. If they are still unsatisfied with the School response then they can contact the Information Commissioner's Office by telephone on 0303 123 1113 or by accessing their website via the link <https://ico.org.uk/make-a-complaint/>