



*Saint***GREGORY'S**
Bath

Subject Access Request Procedure

Title	Subject Access Request Procedure	
Prepared By	Karen Tyler - Data Manager	Date: February 2020
Checked By	Gerry Cross - Facilities and ICT Manager	Date: September 2021
Last Approved By	Governors' Finance and Premises Committee	Date: September 2023
Version	V01.02	
Document Update	September 2024	

Version History

Version	Date	Amendments
V01.00	February 2020	Approved by Governors
V01.01	July 2020	Use DPO email address
V01.02	September 2023	Reapproved by Governors

“In Christ we flourish”

Introduction

Individuals can request access to the personal data an organisation holds about them – this is called a Subject Access Request. This procedure is intended to ensure compliance with GDPR and the Data Protection Act 2018 in the event of a Subject Access Request. Please read this procedure in conjunction with the school's Data Protection Policy

This document sets out the process to be followed in order for an individual to make a Subject Access Request and the procedure that the school will follow in order to make a response to the request. In the case of a student who is in Years 7 to 11, the request could be made by a parent/carers.

Making a Subject Access Request

If a member of our community (student, member of staff, parent, carer or other contact) wishes to make a subject access request they should put their request in writing (either in a letter or an email). The request should be sent to the Data Protection Officer at dpo@st-gregorys.org.uk and should include the following:

- The name, date of birth and address of the data subject;
- The name, address and relationship to the data subject of the requester, if the requester is not the data subject;
- Details of the personal data that is being requested.

If the request is being made by email please include "Subject Access Request" in the subject line.

Responding to a Subject Access Request

1. Verifying the identity of the requester

The Data Protection Officer will verify the requester's identity. If a request for a student's data is made the school will reply to the parent/carers for students in Years 7 to 11 or to the student themselves for Years 12 and 13.

2. Providing an initial response

An initial response will be provided within 72 hours. The Data Protection Officer will make sure they understand exactly what information the requester is looking for and will seek clarification if there is any ambiguity. If the school does not have the information the requester will be informed as soon as possible.

Please note the following:

- A Subject Access Request does not have to be complied with if it would mean disclosing information about another individual who can be identified from the information, unless the other individual has consented to its disclosure. If this is the case the requester will be informed that their request cannot be fulfilled.

- If a request is manifestly unfounded or excessive the school will request a reasonable fee to deal with the request. An explanation for this will be provided to the requester.

3. Providing the data

The data requested will be provided within one month of the initial request. If the request is complex or a number of requests have been received from the same individual, the deadline may be extended by a further two months. If the deadline is extended the requester will be informed within one month of the initial request, giving an explanation as to why the extension is necessary.

The information will be provided in a concise, transparent, intelligible and easily accessible form which uses clear, plain language.

If an individual requests additional copies of their data, a fee will be calculated based on the administrative costs of providing further copies.

Concerns

If you have any concerns regarding the way we have dealt with your Subject Access Request please raise this with us in the first instance. Alternatively you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns>.