

Subject Access Request Procedure

HAYFIELD LANE PRIMARY

1. Scope

All personal data processed by Hayfield Lane Primary is within the scope of this procedure.

Data subjects are entitled to obtain:

- Confirmation as to whether the school is processing any personal data about that individual;
- Access to their personal data;
- Any related information;
- The logic involved in any automated decisions relating to him or her.

2. Responsibilities

- 2.1 The Data Protection Officer (Mrs John-Lewis) is responsible for the application and effective working of this procedure, and for reporting to the information owner , Head teacher, on Subject Access Requests (SARs).
- 2.2 The Data Protection Officer is responsible for handling all SARs.

3. Procedure

- 3.1 Subject Access Requests are made/recorded using the Subject Access Request Form.
- 3.2 The data subject provides the School with evidence of their identity, in the form of a current passport/driving license, Birth Certificate, recent utility bill, bank statement or current Vehicle Registration Document, and the signature on the identity must be cross-checked to that on the application form
- 3.3 The data subject specifies to the school specific set of data held by Hayfield Lane Primary on their subject access request (SAR). The data subject can request all data held on them.
- 3.4 The School records the date that the identification checks were conducted and the specification of the data sought.
- 3.5 The School provides the requested information to the data subject within one month from this recorded date. There are no circumstances in which an extension to that one month will be provided, and failure to provide the requested information within that one month is a breach of the GDPR.
- 3.6 Once received, the subject access request (SAR) application is immediately forwarded to the Data Protection Officer, who will ensure that the requested data is collected within the specified time frame in clause 3.4 above.
Collection entails:
 - 3.6.1 Collecting the data specified by the data subject, or
 - 3.6.2 Searching all databases and all relevant filing systems (manual files) in school, including all back up and archived files (computerised or manual) and all email folders and archives.
 - 3.6.3 Data may not be altered or destroyed in order to avoid disclosure.
- 3.7 The Data Protection Officer / GDPR Owner maintains a record of requests for data and of its receipt, including dates.
- 3.8 The Data Protection Officer / GDPR Owner reviews subject access requests from a child. Before responding to a SAR of the child data subject the Data Protection Officer / GDPR Owner considers their ability to making the request.
- 3.9 The Data Protection Officer / GDPR Owner reviews all documents that have been provided to identify whether any third parties are present in it, and either removes the identifying third party information from the documentation or obtains written consent from the third party for their identity to be revealed.
- 3.10 If any of the requested data is being held or processed under one of the following exemptions, it does not have to be provided:
 - National security
 - Crime and taxation

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- Health
 - Educational records or relates to social work
 - Regulatory activity
 - Journalism, literature and art
 - Research history, and statistics
 - Publicly available information
 - Corporate finance
 - Examination marks
 - Examinations scripts
 - Domestic processing
 - Confidential references
 - Judicial appointments, honours and dignities
 - Crown of ministerial appointments
 - Management forecasts
 - Negotiations
 - Legal advice and proceedings
 - Self-incrimination
 - Human fertilization and embryology
 - Adoption records
 - Special educational needs
 - Parental records and reports
- 3.11 In the event that a data subject requests the School to provide them with the personal data stored by the controller/processor, then the School will provide the data subject with the requested information in electronic format, unless otherwise specified. All of the items provided to the data subject are recorded on a schedule that shows the data subject's name and the date on which the information is delivered to, and received by, the data subject.
- 3.12 In the event that a data subject requests what personal data is being processed then the School provides the data subject with the following information:
- 3.12.1 Purpose of the processing
 - 3.12.2 Categories of personal data
 - 3.12.3 Recipient(s) of the information, including recipients in third countries or international organisations
 - 3.12.4 How long the personal data will be stored
 - 3.12.5 The data subject's right to request rectification or erasure, restriction or objection, relative to their personal data being processed.
 - 3.12.5.1 The School removes personal data from systems and processing operations as soon as a request for erasure has been submitted by the data subject.
 - 3.12.5.2 The School contacts and communicates with other organisations, where the personal data of the data subject is being processed, to cease processing information at the request of the data subject.
 - 3.12.5.3 The School takes appropriate measures without undue delay in the event that the data subject has: withdrawn consent; objects to the processing of their personal data in whole or part; no longer under legal obligation and/or has been unlawfully processed.
 - 3.12.6 Inform the data subject of their right to lodge a complaint with the supervisory authority and a method to do so.
 - 3.12.7 Information on the source of the personal data if it hasn't been collected from the data subject.
 - 3.12.8 Inform the data subject of any automated decision-making.
 - 3.12.9 If and where personal data has been transferred and information on any safeguards in place.

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4. Document Owner and Approval

The Data Protection Officer / GDPR Owner is the owner of this document and is responsible for ensuring that this procedure is reviewed in line with the review requirements of the GDPR.

A current version of this document is available to all members of staff on the website and is published.

This procedure was approved by the Governing Body on 10th May 2018 .

5. Change History Record

| Issue | Description of Change | Approval | Date of Issue |
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