



# Subject Access Requests

**Children first; in the footsteps of St. Chad**

**As we follow Christ in the footsteps of St. Chad, we seek to be servant leaders who have a desire to see all those, within our Trust family, truly flourish both spiritually and academically.**

|                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                    |                 |                  |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|------------------|
| Document title                                                                                                                                                                                                                                                                                                      | Subject Access Requests                                                                                                                                                                                                            |                 |                  |
| Owner                                                                                                                                                                                                                                                                                                               | Data Protection Officer DPO                                                                                                                                                                                                        |                 |                  |
| Version                                                                                                                                                                                                                                                                                                             | 1.0                                                                                                                                                                                                                                | Status          | Final            |
| Approved on                                                                                                                                                                                                                                                                                                         | 1 September 2025                                                                                                                                                                                                                   | Effective from  | 1 September 2025 |
| Last updated                                                                                                                                                                                                                                                                                                        | 19 August 2025                                                                                                                                                                                                                     | Last updated by | Trust DPO        |
| Review date                                                                                                                                                                                                                                                                                                         | 1 September 2027                                                                                                                                                                                                                   |                 |                  |
| Purpose                                                                                                                                                                                                                                                                                                             | To effectively manage subject access ‘data’ requests across the Trust and ensure robust and safe information processing and reporting mechanism are effectively managed to support reporting to Finance, Risk and Audit Committee. |                 |                  |
| The policy has been implemented following consultation, in line with statutory practice, with the Trust DPO and Chief of Operations, and the Trust Finance, Risk and Audit Committee (‘the Committee’), and may be amended from time to time, following further consultation with the Committee and/or Trust Board. |                                                                                                                                                                                                                                    |                 |                  |
|                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                    |                 |                  |
| Related Documents                                                                                                                                                                                                                                                                                                   | St Chad’s GDPR Policy                                                                                                                                                                                                              |                 |                  |
| References                                                                                                                                                                                                                                                                                                          | <a href="https://ico.org.uk/">https://ico.org.uk/</a>                                                                                                                                                                              |                 |                  |

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## 1.0 Introduction

- 1.1 St Chad's Academies Trust ('the Trust') is committed to ensuring that it provides a strong infrastructure to enable our academies to flourish and improve. The Trust recognises that its leaders and colleagues are central to this success and greatly values their commitment and contribution.
- 1.2 The core values of the Trust form the basis of all discussions with colleagues. We expect all colleagues of St. Chad's Academies Trust to respect and model these values.



## 2.0 Scope

- 2.1 This procedure defines the process to be followed when a request for access to personal data is received. A failure to comply with the provisions of the Data Protection Act 2018 and UK General Data Protection Regulation (GDPR) in responding to requests may render the Trust liable to prosecution as well as giving rise to civil liabilities.
- 2.2 Subject Access Requests ('SARS') can be received in any format, whether this be verbally or in writing, the timescales for completion remain the same.
- 2.3 All requests should be confirmed directly to the Trust Data Protection Officer, DPO without delay and the information recorded centrally.

### 3.0 Role and Responsibilities

|                                    |                                                                                                             |
|------------------------------------|-------------------------------------------------------------------------------------------------------------|
| <b>Data Protection Officer DPO</b> | Responsible for ensuring that statutory and regulatory obligations with respect to the GDPR are adhered to. |
| <b>Academy Data Manager</b>        | Responsible for handling Subject Access Requests at the academy                                             |

### 4.0 Terms and Acronyms

|                                   |                                                                                                                                                                                                                                                                |
|-----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Data Subject</b>               | The identified or identifiable living individual to whom personal data relates.                                                                                                                                                                                |
| <b>Personal data</b>              | Personal data only includes information relating to natural persons who can be identified or who are identifiable, directly from the information in question, or who can be indirectly identified from that information in combination with other information. |
| <b>Subject Access Request SAR</b> | A formal request made to a company by a data subject inquiring what of the data subject's personal information has been collected, stored, and used (processed).                                                                                               |
| <b>Individual</b>                 | The person making the request for the personal data i.e. a parent making a request for child data.                                                                                                                                                             |

### 5.0 Logging a Subject Access Request SAR

- 5.1 Once a Subject Access Request has been received the academy data manager or person responsible for responding to the request must log the request with the Trust DPO.
- 5.2 The Trust DPO will add this request to the centrally held log and track the progress of the Subject Access Request.

### 6.0 Valid Subject Access Request

- 6.1 A valid Subject Access Request can be received in any format including but not limited to, in writing, verbally or on social media. An individual does not need to use any specific wording to define their request, however, the Trust can request further details to assist in ensuring we have all relevant information to process the request.
- 6.2 A Subject Access Request can only be fulfilled when we have validated the identity of the individual making the request and have all of the information required to provide the information requested.
- 6.3 Where the Subject Access Request is not valid the academy data manager or person responsible for responding to the request will contact the person making the request, to seek further information.

6.4 Once the Trust DPO, academy data manager, or person responsible for responding to the request has received all the information they need and sufficient information to verify the individual's identity, the Trust has one month to provide the information requested.

6.5 Exceptions and extensions to the timeline can be considered and must be discussed with Trust DPO in all cases. An exception/extension needs to be managed effectively and reasonably with the individual requesting the data, with any agreed extension recorded with the Trust DPO.

## **7.0 Correctly identifying the data subject**

7.1 Before disclosing any personal information, the Trust DPO, academy data manager, or person responsible for responding to the request must verify the identity of the data subject.

7.2 Whilst it is important that the Trust does not send copies of personal information to people who are not the data subject, we must not appear obstructive. The Data Protection Act requires the Trust to take "reasonable measures" to verify the identity of a data subject. The Trust DPO, academy data manager, or person responsible for responding to the request shall keep a record of what measures they have taken to verify the identity of the person making the request.

## **8.0 Locating personal information for the Subject Access Request**

8.1 The academy data manager, or person responsible for responding to the request will work with Trust DPO to identify systems where personal data of the data subject is being held, as well as identifying the means by which the personal data can be extracted.

8.2 When the systems have been identified, the academy data manager will carry out searches to identify personal data held on the data subject and export to a secure area so that personal data can be combined before the data can be screened prior to disclosure to the data subject.

8.3 There is no requirement to conduct searches that would be unreasonable or disproportionate to the importance of providing the personal data.

8.4 There is no requirement to process manifestly unfounded and excessive requests, where:

- The individual clearly has no intention to exercise their right or if the request is malicious in intent
- Using the request to harass an organisation (for the purpose of this policy this refers to the Trust and/or academy), with no real purpose other than to cause disruption.

8.5 It is the responsibility of the Trust to evidence how the request is unfounded. Factors that may indicate a manifestly unfounded request include:

- Individual explicitly states they intend to cause disruption.
- Request makes unsubstantiated/false accusations against the Trust or Trust colleagues.
- The individual offers to withdraw their request in return for a benefit from the Trust and/or academy.
- The individual systematically or frequently sends different requests to the Trust and/or academy, as part of a campaign with the intention of causing disruption, not just as a Subject Access Request, but in the form of a complaint.

8.6 In all cases in support of clauses 8.4 – 8.5 support from the Trust DPO must be sought. The Trust DPO will also seek legal counsel through the Trust legal retainer.

## **9.0 Reviewing personal information and what cannot be disclosed as a result of a Subject Access Request SARS**

- 9.1 Following completion of the collation of information from the various Trust sources, where applicable, held about a data subject, the information must be examined by the Trust DPO, in all cases, to establish if it should be disclosed. This must be done on a case-by-case basis for each individual piece of information. In some cases, the Trust may only disclose extracts from particular documents. This shall include checking that the record is actually about the person (data subject) concerned and not about someone else with the same name, screening out any duplicate records.
- 9.2 There may be instances where personal information does not require to be disclosed. The Trust DPO will determine if any of the exemptions apply before releasing personal information.
- 9.3 Where a document contains personal data about a number of individuals, including the data subject, the Trust DPO, academy data manager, or responsible person must ensure they do not disclose/include the information about the third parties to the data subject, when collating the information. If the record is primarily about the data subject, with incidental information about others, then third-party information will be redacted. If the record is primarily about third parties, then the document will be withheld if redacting is not possible.
- 9.4 Where possible, and proportionate, third parties will be contacted to obtain consent to disclose the document.
- 9.5 The academy data manager collating the Subject Access Request must complete the disclosure form (**Appendix 1**) and submit the completed document to the Trust DPO for records to be maintained.

## **10.0 Sending personal data to data subject**

- 10.1 The personal data of the data subject will be sent to the individual, it will be determined by the Trust DPO and academy data manager the most secure method of sharing, these could be
- Secure electronic file transfer
  - Supplying printed documents where reasonable and proportionate
  - Share link for access and download of documents

Details of the appropriate transfer will be provided to the individual requesting the data prior to completion of the request.

## **11.0 Reporting to Finance, Risk, and Audit Committee (the 'Committee')**

- 11.1 With the completion of the Subject Access Request, the data is compiled by the Trust DPO and shared with the Trust CoO for presentation to the Committee. Data shared with the Committee will relate to the number of requests and effective management of Subject Access Requests.

The Committee holds specific responsibility for GDPR (data protection), under which SARS sit. Members of the Committee must ensure there are no concerns raised about a request, no unnecessary/unreasonable delays, and to strategically consider compliance, practice, policy, and procedure to mitigate, monitor, and manage risk relative to data protection.

**Appendix 1 (Disclosure Form)**

|              |  |
|--------------|--|
| Data Subject |  |
|--------------|--|

|                |  |
|----------------|--|
| Date requested |  |
|----------------|--|

|              |  |
|--------------|--|
| Requested by |  |
|--------------|--|

|              |  |
|--------------|--|
| Academy name |  |
|--------------|--|

|                                                                                                                                                                                                                  |  |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| <p>Request details</p> <p><i>Please add a copy of the email or letter if you have one.</i></p>                                                                                                                   |  |
| <p>Disclosure Contents</p> <p><i>Please list details of documents being disclosed the method and any omissions from the disclosure and why.</i></p> <p><i>Add details of who this is being disclosed to.</i></p> |  |

Final Disclosure date .....