



# SUBJECT ACCESS REQUEST PROCEDURE

## 1. Scope

All personal data processed by Graham James Primary Academy is within the scope of this procedure.

Data subjects are entitled to obtain:

- Confirmation as to whether Graham James Primary Academy is processing any personal data about that individual;
- Access to their personal data;
- Any related information;

## 2. Responsibilities

- 2.1 The Data Protection Officer is responsible for the application and effective working of this procedure, and for reporting to the information on Subject Access Requests (SARs).
- 2.2 The Data Protection Officer and designated employees are responsible for handling all SARs.

## 3. Procedure

- 3.1 Subject Access Requests are made using the Subject Access Request Record or via email or post
- 3.2 The data subject provides Graham James Primary Academy with evidence of their identity in the form of a current passport/driving license, and the signature on the identity must be cross-checked to that on the application form
- 3.3 The data subject specifies to Graham James Primary Academy specific set of data held by Graham James Primary Academy on their subject access request (SAR). The data subject can request all data held on them.
- 3.4 Graham James Primary Academy records the date that the identification checks were conducted and the specification of the data sought.
- 3.5 Graham James Primary Academy provides the requested information to the data subject within one month from this recorded date.
- 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 3.5 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 Graham James Primary Academy, including all back up and archived files (computerised or manual) and all email folders and archives. The Trust maintains a data map that identifies where all data in Graham James Primary Academy is stored
- 3.7 The Data Protection Officer maintains a record of requests for data and of its receipt, including dates.

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- 3.8 The Data Protection Officer / designated employee reviews subject access requests from a child. Before responding to a SAR of the child data subject the Data Protection Officer considers their ability to making the request.
- 3.9 The Data Protection Officer 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 Some of the data being processed may be exempt from being included in a Subject Access Request under the data Protection Act 2018 and would to be checked before being included.
- 3.11 In the event that a data subject requests Graham James Primary Academy to provide them with the personal data stored by the controller/processor, then Graham James Primary Academy 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 listed in a schedule that shows the data subject's name and the date on which the information is delivered to the data subject.
- 3.12 In the event that a data subject requests what personal data is being processed then Graham James Primary Academy 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 Graham James Primary Academy 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 Graham James Primary Academy 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 Graham James Primary Academy 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 (Complaints Procedure).
  - 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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### Document Owner and Approval

The Data Protection Officer 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 and DPA 2018.

A current version of this document is available to members of staff

This procedure was approved by the Board of Governors (CEO) on .....and is issued on a version controlled basis under his/her signature.

Signature:

Date:

### Change History Record

Issue	Description of Change	Approval	Date of Issue
1	Initial issue	Chair of Governors	31/10/18