

# SUBJECT ACCESS REQUEST PROCEDURE

<b>POLICY NUMBER &amp; CATEGORY</b>	<b>QSC/12/APP2</b>	<b>Quality &amp; Standards</b>
<b>VERSION NO &amp; DATE</b>	<b>3</b>	<b>March 2018</b>
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## **1 SCOPE**

**1.1** All processing of personal data by Focus School Dunstable and Northampton Campus (hereafter 'the Campus') is within the scope of this procedure.

**1.2** Data subjects are entitled to obtain:

**1.2.1** Confirmation as to whether the Campus is processing any personal data about that individual;

**1.2.2** Access to their personal data;

**1.2.3** Any related information;

## **2 POLICY**

**2.1** The Data Protection Lead (DPL) is responsible for the application and effective working of this procedure, and for reporting to the information owner on Subject Access Requests (SARs).

**2.2** The DPL is responsible for handling all SARs.

## **3 PROCEDURE**

**3.1** Subject Access Requests are made using the Subject Access Request Record

**3.2** The data subject provides the Campus with evidence of their identity, in one of the forms below and the signature on the identity must be cross-checked to that on the application form:

**3.2.1** Current Passport

**3.2.2** Driving License

**3.2.3** Birth Certificate

**3.2.4** Utility Bill (from last 3 months)

**3.2.5** Bank Statement (from last 3 months)

**3.3** The data subject specifies to the Campus specific set of data held by the Campus on their subject access request (SAR). The data subject can request all data held on them.

**3.4** The Campus records the date that the identification checks were conducted and the specification of the data sought.

**3.5** The Campus 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 DPL, 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 the Campus, including all back up and archived files (computerised or manual) and all email folders and archives. The DPL maintains a data map that identifies where all data in the Campus is stored.

**3.7** The DPL maintains a record of requests for data and of its receipt, including dates.

- 3.8** The DPL reviews subject access requests from a child. Before responding to a SAR of the child data subject the DPL considers their ability to making the request by adequately explaining any implications of sharing their personal data.
- 3.9** The DPL 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
  - Health
  - Education
  - 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
  - Management forecasts
  - Negotiations
  - Legal advice and proceedings
  - Self-incrimination
  - Adoption records
  - Special educational needs
  - Parental records and reports
- 3.11** In the event that a data subject requests the Campus to provide them with the personal data stored by the controller, then the Campus 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 on 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 the Campus 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.

- The Campus removes personal data from systems and processing operations as soon as a request for erasure has been submitted by the data subject.
- The Campus contacts and communicates by email 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.
- The Campus 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.

**3.13** The Campus uses the following electronic formats to respond to SARs:

- .xml
- .xls

