



Plaistow Primary School

Subject Access Request Policy

Policy owned by:	Janine St Pierre
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Shared with Staff:	Autumn 2018
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This policy is subject to changes in accordance with updates from the Information Commissioner's Office (ICO)

Should you have any questions regarding the policy please contact the Data Protection Officer on dpo@plaistow.newham.sch.uk

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Statement of Intent

This policy is designed to inform individuals of their rights to find out what information the school holds about them, why we hold it and who we disclose it to is fundamental to good information-handling practice. The Data Protection Act 1998 gives individuals the right to request access to such information. The General Data Protection Regulations (GDPR), enforceable from 25th May 2018, strengthens individuals rights, including those covered under Subject Access Requests.

This policy is adopted using the changes that came into effect in May 2018.

Plaistow Primary School is committed to protecting individuals through ensuring robust procedures are in place to ensure that the data of individuals is not compromised. Internal management and control procedures and policies are monitored by senior management.

This policy and procedures document outlines the rights of individuals¹ to request access to personal data that the school may hold about them.

Personal Data

Personal data is defined within GDPR as '**any information relating to an individual by which they can be directly or indirectly identified**'. In other words any data we hold that could allow another individual to identify that person. This would include any one or a combination of, but is not necessarily limited to the following:-

- Name
- Address
- Date of Birth
- Telephone Number
- Email Address
- Unique Pupil Number
- National Insurance Number
- Passport Number

The personal data that Plaistow Primary School holds is set out within the school's Privacy Notices which are available from the school.

The Right of Access

Under GDPR individuals have the right to obtain:

- confirmation that their data is being processed;
- access to their personal data; and
- other supplementary information

Requests for such information (subject access requests) must be made following the procedure outlined in the Procedures section of this policy.

¹ Individuals at Plaistow Primary include pupils, parents and staff

Subject Access Requests Procedures

In the event that a parent, carer or staff member wishes to pursue their right to obtain information that the school holds about them, they are required to follow the procedures below. Plaistow Primary School shall also adhere to the internal procedures detailed.

Making a Subject Access Request

Any individual wishing to access information about the data we hold are allowed to make this request either written or verbally. As a school we deal with a lot of information on a daily basis and so we would ask that where possible, the Subject Access Request form is completed and sent to the school by post, pupil post or email, for the attention of the Head Teacher. In the event that the individual is unable to access the form he or she may submit their request through standard post or email or over the telephone. Please note, if you are making a verbal request, the school will need to verify your identity and therefore will need to ask you some security questions over the phone or ask you to provide more information.

Verifying Identity of Individual

In order to continue its commitment to protecting individuals, staff at Plaistow Primary School shall, on receipt of a request, contact the individual that has requested the information by telephone in order to verify the identity and authenticity of the request. The staff member will ask some security questions.

Timescale

Upon receipt of the subject access request the school shall contact the individual for verification purposes within 3 working days. Subject Access Requests (SARs) will be responded to within one month of the request being received by the school. Plaistow Primary School reserves the right to extend this period by a further two months, upon consultation with the individual, where the request is complex or excessive.

Fees

The GDPR states that organisations (including schools) shall not charge a fee for provision of access unless the request is manifestly unfounded or excessive, particularly because they are repetitive. In accordance with this Plaistow Primary School shall not charge a fee where the request is reasonable but reserves the right to charge a *reasonable fee*, calculated on the time required to fulfil the requirements of the request if deemed complex or excessive. In this event the individual will be informed within one month of the date that the request was received.

Refusal to respond

The school has the right to refuse to respond to a request that is *manifestly unfounded or excessive*. In the event that the school refuses to respond it will inform the individual, without undue delay and within one month, of the reason for the refusal and their right to complain.

How the information is issued

Information may be supplied electronically or in paper format. An analysis will be made to determine which of the formats is the most appropriate and the decision will be agreed between the person making the request and the school. In the event that the information is supplied electronically it will be provided in PDF format.

Whilst the GDPR recommends good practice to provide access to a self-service portal this is not currently available at the school.

Subject Access Requests will, at all times, be managed by a member of the administrative team.
Please note that a Subject Access Request Form is available from the school's website.