



POLICY NAME: Subject Access Request Policy

ADOPTED: October 2023

REVIEW PERIOD: Annually

REVIEWER: Director of Risk and Compliance

Policy Document Version Control

Version 1

Responsibility for Policy:	Data Protection Officer
Policy approval/date:	July 23 (trust)
Frequency of Review:	Annual
Next Review date:	July 2024
Related Policies:	<i>Data protection policy</i> Rowan Learning Trust - GDPR & Data Protection - All Documents (sharepoint.com)
Minor Revisions:	22nd July 2023 - It was incorrectly stated in the original policy that school holidays could be a reason to extend the 30-day deadline. It isn't. This has now been removed from the policy.

Version 2

Responsibility for Policy:	Data Protection Officer
Policy approval/date:	July 23 (trust)
Frequency of Review:	Annual
Next Review date:	July 2024
Related Policies:	<i>Data protection policy</i> Rowan Learning Trust - GDPR & Data Protection - All Documents (sharepoint.com)
Minor Revisions:	5th September 2023 - It is now clearly defined in sections 4.3 and 4.4 who staff need to report a subject access request to.

Version 3

Responsibility for Policy:	Data Protection Officer
Policy approval/date:	July 23 (trust)
Frequency of Review:	Annual
Next Review date:	July 2024
Related Policies:	<i>Data protection policy</i> Rowan Learning Trust - GDPR & Data Protection - All Documents (sharepoint.com)
Minor Revisions:	Updates to sections 4.3 and 4.4 were made on 9 th Feb 2024. A new section 7 was also added that states what happens in terms of retention and disposal of the SAR information. Please follow the link Data Retention

Contents

Page 1	Individual Rights
Page 1	What is personal information?
Page 1	Changes to personal data
Page 1	Making a subject access request
Page 1	What do we do when we receive a subject access request?
Page 1	What is the timeframe for responding to subject access requests?
Page 1	Data Retention
Page 1	Complaints procedure

Purpose

This document sets out our policy for responding to subject access requests (SARs) under the GDPR (General Data Protection Regulation), which came into force in May 2018. This document explains the rights of the data subject in relation to a data subject access request and the Rowan Learning Trust's responsibilities when dealing with that request.

1. Individual Rights

1.1 An individual has the right to know what information is held about them. GDPR in the UK provides a framework to ensure that personal information is handled properly. This information must be:

- Processed fairly, lawfully and in a transparent manner
- Processed for specific, legitimate and lawful purposes
- Adequate, relevant and not excessive
- Accurate and up to date
- Not kept for longer than necessary
- Processed in line with an individual's rights
- Secure
- Not transferred other than in accordance with agreed terms and conditions

1.2 A subject access request is a written or verbal request for personal information held about you by The Rowan Learning Trust. You have the right to see what personal information we hold about you. You are entitled to be given confirmation as to whether we hold or process your personal information, and if so, you are entitled to access all your personal information as well as details of:

- The purposes for which we process your personal data;
 - The categories of your personal data we process;
 - The recipients, or categories or recipient to whom personal data has been or will be disclosed, in particular recipients in third countries or who are international organisations;
 - How long we expect to store your data;
 - Where you did not give us the personal data, the source from which we collected the personal data; and
 - Whether we use any automated decision making in relation to the processing of your personal data.
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2. What is personal information?

- Personal data is information which relates to an individual or refers to the individual. Data refers to an individual if that individual can be identified such as by using their name, identification number, location data or factors specific to the individual such as physical, physiological, genetic, mental, economic, cultural or social identity of the individual.

3. Changes to personal data

- You are entitled to have any mistakes in your personal data rectified, and to have the data deleted if you would no longer like us to store or process your personal data, or to request restriction of our processing of your personal data. If you would like further information on this then please email the Trust's Data Protection Officer (DPO), Chris Bolton at DPO@rlt.education

4. Making a subject access request

- Following a written request (via email to the school) for a subject access request the school will respond with a notice of acceptance. You may also request a SAR verbally by phone. In either case, the school will ask you to present further information to confirm your identity. The school would then send a letter of confirmation that you have requested a SAR verbally and presented the necessary documentation. The school must also inform the DPO that a request has been made and may request advice or support with the process.
- In the event that a request is made out of school it will be the Data Protection Officer that will make first contact with you to acknowledge your request. The relevant individuals in the school will be notified by the DPO of the request and this will not affect the time scale (section 6).
- Each SAR is dealt with on an individual basis. However, the school/Trust does reserve the right to refuse a request if it is deemed that the request is manifestly unfounded or excessive. For further information on this please visit the Information Commissioner's Office's website <https://ico.org.uk/>.
- You may make a subject access through many forms of communication including, phone, email or verbally. This may be to any member of staff. Upon getting a subject access request all staff should immediately contact the data protection lead within the school or email the data protection officer asap at dpo@rlt.education. This request will then be logged on to the GDPR Sentry dashboard.
- If you are a member of staff requesting a subject access request then please contact the data protection lead who will log the request on to the system or contact the DPO at dpo@rlt.education.

5. What do we do when we receive a subject access request?

- Collating information – we will gather any physical or electronically held information and identify any information provided by a third party or which identifies a third party. Before sharing information that relates to third parties, we will, where possible, anonymise or edit information that might affect another party's privacy. We may also summarise information rather than provide a copy of the whole document. The GDPR requires us to provide information, not documents.

6. What is the timeframe for responding to subject access requests?

- We have one month (30 calendar days) starting from when we received the request and the information necessary to identify you. Wherever possible, we will aim to complete the request in advance of the deadline, however, we may also contact you with a request to extend the deadline, if in exceptional circumstances, we will be unable to complete it within the month.
- Wherever possible, copies of the information will be sent to you electronically and will be encrypted to protect the data. If this is not technically possible, we will either hand deliver the documentation and request a signature or send them via recorded delivery. There is also the option of attending school and collecting them in person and signing for them.

7. Data Retention

- When a subject access request has been completed, all the documentation will be loaded on to the GDPR Sentry dashboard and will be deleted from the staff member's documents.



8. Complaints procedure

8.1 An individual having any complaint in connection with our actions has the right to present a complaint in writing to the Data Protection Officer.

Data Protection Officer
The Rowan Learning Trust
Carr Lane
Wigan,
WN3 6AF

Email: DPO@rtl.education

8.2 If you remain dissatisfied, you have the right to report your concern to the Information Commissioner's Office (ICO).

The Information Commissioner's Office,
Wycliffe House,
Water Lane,
Wilmslow,
Cheshire
SK9 5AF
Telephone: 08456 30 60 60 or 01625 54 57 45 <https://ico.org.uk>

