Cefn Saeson Comprehensive School
Ysgol Gyfun Cefn Saeson

Subject Access Request Policy

Created	October 2021
Headteacher	Miss C Jones
Updated and Reviewed	Autumn 2026
Chair of Governors	Mr S John

Introduction

This policy sets out Cefn Saeson Comprehensive School's procedure for responding to Subject Access Requests (SARs) made under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Individuals have the right to obtain confirmation that their personal data is being processed and to access their personal data together with certain supplementary information about how it is used.

What is a Subject Access Request?

A Subject Access Request (SAR) is a request from an individual for access to personal data held about them by the School.

A SAR may be made verbally or in writing and can be submitted by the individual themselves or by a person authorised to act on their behalf.

Verifying Identity

Before responding to a SAR, the School may take reasonable steps to verify the identity of the person making the request.

In most cases, where the school already knows the requester, no further evidence will be required. However, where there are reasonable doubts regarding identity or authority to act on behalf of another person, the school may request additional information before processing the request. The statutory timescale for responding will begin when sufficient identification has been provided.

Requests Made on Behalf of Children

The rights under data protection legislation belong to the child, not to their parent or guardian.

Where a parent or other representative submits a SAR on behalf of a pupil, the school will consider:

- the age and maturity of the child;
- the child's ability to understand their rights;
- any evidence of the child's consent;
- whether disclosure is in the child's best interests.

The School may seek the views of the child where appropriate before disclosing information.

Responding to a Request

Upon receipt of a valid SAR, the School will:

- identify and locate the personal data requested;
- search relevant electronic and paper records, including emails where appropriate;
- review the information to determine whether any exemptions apply;
- consider the rights and freedoms of other individuals whose information may be included in the records.

The School will respond without undue delay and, in any event, within one calendar month of receiving the request and any information required to verify identity.

Where a request is particularly complex or where multiple requests have been received from the same individual, the School may extend the response period by up to a further two months. In such circumstances, the School will inform the requester within one month of receipt of the request and explain the reasons for the extension.

Information Provided

When responding to a SAR, the School will provide:

- a copy of the personal data requested;
- confirmation of whether personal data is being processed;
- the purposes of the processing;
- the categories of personal data concerned;
- details of recipients or categories of recipients who receive the data;
- retention periods, where known;
- information about the individual's rights to rectification, erasure, restriction and objection;
- information about the right to complain to the Information Commissioner's Office (ICO);
- information about the source of the data, where it was not obtained directly from the individual.

Information will be provided in a concise, transparent and accessible format and, where appropriate, electronically.

Third-Party Information

Personal data may sometimes contain information relating to other individuals.

Where a SAR includes information that identifies another person, the School will consider:

- whether the third party has consented to disclosure;
- whether it is reasonable to disclose the information without consent;
- whether information can be redacted so that the rights of all parties are protected.

The School will balance the requester's right of access against the rights and freedoms of other individuals before making a decision.

Exemptions

The UK GDPR and Data Protection Act 2018 contain a number of exemptions which may limit the information that can be disclosed in response to a SAR.

Examples include:

- information protected by legal professional privilege;
- information relating to the prevention or detection of crime;
- information that would adversely affect the rights and freedoms of others.

Each request will be considered on its own merits and the School may seek legal advice where appropriate.

Fees

The School will normally provide information free of charge.

However, the School may charge a reasonable fee or refuse to comply with a request where it is manifestly unfounded or excessive, particularly where requests are repetitive. Any such decision will be communicated to the requester together with the reasons for the decision.

Refusal of Requests

Where the School refuses all or part of a request, it will inform the requester in writing of:

- the reasons for the refusal;
- their right to request an internal review or make a complaint;
- their right to complain to the Information Commissioner's Office;
- their right to seek a judicial remedy.

Right to Rectification

Individuals have the right to request that inaccurate personal data be corrected.

Where the School agrees that information is inaccurate, it will be corrected without undue delay. Where the School disagrees, it will explain the reasons and inform the individual of their right to complain to the ICO.

Complaints

If you are dissatisfied with how your request has been handled, you should contact the School in the first instance:

Mrs A Powis
Business Manager
Cefn Saeson Comprehensive School

If you remain dissatisfied, you have the right to complain to the Information Commissioner's Office (ICO):

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Telephone: **0303 123 1113**
Website: **www.ico.org.uk**

CEFN SAESON COMPREHENSIVE SCHOOL
SUBJECT ACCESS REQUEST

Name of requester:	
Address:	
Email:	
Telephone:	
Nature of Request	
File Reference:	
Date of Request:	
Date of Acknowledgement:	
Date of Full Response:	
Was all information provided? Yes No	
If no what were the grounds for refusal?	