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# THE HEATH ACADEMY TRUST

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## SUBJECT ACCESS REQUEST POLICY



*inspire transform together*

Summary	
Policy Reference Number:	027
Category:	Data Protection
Authorised By:	Board Of Directors
Committee Responsible:	Board Of Directors
Version:	2019-1
Status:	21/03/2018: Approved at Full Trust Board. December 2018: Review of policy carried out by Trust DPO's (Jo Lolley & Selina White)  30/01/2019: Approved At Full Trust Board
Next Review Date:	30/01/2020

*The Heath Academy Trust*  
*Registered Address: St Ives Primary & Nursery School, Sandy Lane, St. Ives, Ringwood, Hampshire, BH24 2LE*  
*Registered in England and Wales*  
*Registration Number: 09809895*

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## Definitions

*Note: These terms are standard throughout all policy documents and are designed to provide clarity.*

### Section 1: The MAT

“the Academy Trust” and “Trust”	mean the Heath Academy Trust Company.
“the Board”	means the Board of Directors of the Heath Academy Trust Company.
“the Directors”	refers to the group of (up to 12) Directors who make up the Board, and who are also the Heath Academy Trust’s “Trustees” under charity law.
“Finance Committee”	refers to the Finance and Audit Committee formed by the Board to manage the financial affairs of the Trust.
“Accounting Officer”	is a role held by the Chief Executive Officer (“CEO”) of the Trust, and one which includes a personal responsibility for the financial resources under the Trust’s control. He is accountable for the Trust’s financial affairs.
“Chief Finance Officer” (CFO)	is the Trust’s finance director, and also the Trust Business Manager, to whom the Accounting Officer delegates responsibility for delivery of the Trust’s financial processes and reports , and for the oversight and consolidation of the Academies’ financial data.
“Trust Business Manager” (“TBM”)	Fulfils the CFO role within the Trust, including compliance and statutory returns, as described in the Academies’ Financial Handbook.
“Leadership Team”	is a team representing the Academies, consisting of the Headteachers and the CEO, and the TBM.

*A full description of the positions listed and their responsibilities will be found in the current Academies’ Financial Handbook.*

### Section 2: The Schools

“Academy”	One of the six schools making up the Heath Academy Trust.
“Academies”	All of the six Academies.
“School”	means an Academy within the Trust.
“Finance Officer”	The person responsible for the day to day management of an Academy’s financial operations.
“Governor”	means a formally elected and appointed member of a School’s Governing Body (generally referred to as the LGB).
“Headteacher”	means the senior person at an Academy who may also be an Executive Headteacher and/or elected as a Director of the Board.  A group within each School consisting of the Headteacher, senior staff and the local Governing Body.
“School’s Leadership Team”	

## **1. Introduction**

### **1.1 Subject Access Requests**

Any individual, person with parental responsibility or young person with sufficient capacity has the right to ask what data the school and/or Trust holds about them, and can make a Subject Access Request (SAR).

1.2 A SAR can be made using the 'Subject Access Request' form (Appendix A).

1.3 The Data Protection Officers (DPO's)/Data Protection Controllers (DPC's) have been designated as the individuals who will coordinate the response to a SAR.

1.4 The Trust/school is required to provide the individual with the data it holds on them within one calendar month. An extension of up to one calendar month can be granted if a school closure period is scheduled to occur during the initial one calendar month response time.

1.5 The response to the SAR will be provided in an electronic form.

1.6 It is permissible to ask the individual who has made the request to be more specific about the information that they require in order to ensure that the information they are provided with meets their requirements rather than providing lots of information that may not be relevant to their query.

1.7 Evidence of the identity of the person making the request and their relationship to the pupil must be gained prior to any disclosure of information. This should be recorded on the SAR Log (Appendix B).

1.8 Exemptions to a SAR include:

- Education, Health, Social Work records
- Examination marks and scripts
- Safeguarding records
- Special educational needs
- Parental records and reports
- Legal advice and proceedings
- Adoption and court records and/or reports
- Regulatory activity and official requests e.g. DFE. statistical information
- National security, crime and taxation
- Journalism, literature and art
- Research history and statistics
- Confidential references

## Appendix A - Subject Access Request (SAR) Form

### Part A: Data Subject's Details (person whose information you are requesting)

<b>Title:</b>	
<b>Full Name:</b>	
<b>Date of Birth:</b>	
<b>Address:</b>	
<b>Year Group (if pupil at school)</b>	

### Part B: Requestor Details

<b>Title:</b>	
<b>Full Name:</b>	
<b>Address:</b>	
<b>Phone Number:</b>	
<b>Email Address:</b>	
<b>Evidence Of Identity (e.g. passport, driving licence):</b>	Evidence Provided? Yes / No Details:
<b>Status of Requestor:</b>	Data Subject: Yes / No Parent or person with parental responsibility: Yes / No Other: Yes / No If you have selected 'yes' for 'Other', please outline your role here:

### Part C: Details Of Subject Access Request

<b>Details of Data Being Requested:</b>	
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**Part D: Declaration**

Option 1

I ..... hereby request that Sixpenny Handley First School /Trust provide the data requested about me.

Signed:	
Date:	

Option 2

I ..... hereby request that Sixpenny Handley First School/Trust provide the data requested about ..... (insert child's name) on the basis of the authority that I have.

Signed:	
Date:	

## Appendix B - Subject Access Request (SAR) Log

Data Subject	Request	Date Of SAR	Date DPO/DPC Notified	ID Confirmed	Response Deadline	Extension To Deadline?	Data Held By School	Any Additional Information From Requestor?	Any Information To Be Withheld?	Who Authorised Withholding Information?	Response Checked & Approved By DPO/DPC
e.g. John Smith	All data held about this staff member	01/02/2018	01/02/2018	Passport seen 02/0/2018	01/03/2018	08/03/2018 1 week due to Feb ½ term	Personnel file – hard copy Email correspondence about individual	JS clarified the request links to a grievance they have with their line manager	Redacted email correspondence to remove reference to other employees	DPO/DPC 20/02/2018	DPO/DPC 01/03/2018