



Subject Access Request Procedure

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Purpose of this procedure

This procedure explains how Subject Access Requests (SARs) are handled by Ysgol Y Rhos in relation to personal data about pupils, parents and carers.

A Subject Access Request is a request made by an individual to access the personal data that the School holds about them. This procedure ensures that such requests are managed lawfully, consistently and in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

This procedure applies only to pupil, parent and carer data. Requests relating to employee data are managed under a separate procedure.

Who can make a Subject Access Request

A Subject Access Request may be made by:

- A parent or carer
- A pupil (where the pupil has sufficient understanding)
- An authorised representative acting on behalf of a parent, carer or pupil

Where a request is made on behalf of another person, appropriate evidence of authority must be provided.

Children and Subject Access Requests

Children have the same rights as adults in relation to their personal data.

When a request relates to a pupil, the School will consider whether the child has sufficient understanding to make the request themselves. This will be assessed on a case-by-case basis, taking into account the child's age, maturity and understanding.

Where a pupil is deemed capable of understanding their rights, the School may deal with the request directly with the pupil rather than the parent or carer.

How to make a Subject Access Request

Subject Access Requests may be made verbally or in writing. However, requests made in writing help Ysgol Y Rhos to process the request efficiently.

Requests should be submitted to the School's Data Protection Lead, Sharon Kettlewood – HR Manager and should include:

- The name of the individual making the request
- The name of the pupil (if different)
- Details of the information requested (if known)
- Proof of identity

The School may ask for clarification if a request is unclear.

Proof of identity

Before responding to a Subject Access Request, Ysgol Y Rhos must be satisfied as to the identity of the requester.

The School may request: photographic identification, proof of parental responsibility, written authority where a representative is acting on behalf of another person.

The time limit for responding to a SAR begins once identity has been verified.

Timescales for responding

Ysgol Y Rhos will respond to a Subject Access Request without undue delay and no later than one month from receipt.

Where a request is complex or where multiple requests are received from the same individual, the School may extend the response time by up to two further months. The requester will be informed of any extension and the reasons for it within one month of receipt of the request.

Fees

Subject Access Requests are normally provided free of charge.

A reasonable fee may be charged if a request is: manifestly unfounded or excessive, repetitive or for additional copies of the same information

Any fee charged will be reasonable and proportionate.

Information that may be disclosed

In response to a Subject Access Request, Ysgol Y Rhos will provide:

- Confirmation that personal data is being processed
- A copy of the personal data requested (where applicable)
- Information about the purposes of processing
- The categories of personal data concerned
- Details of who the data has been shared with (where applicable)
- Information about retention periods
- Details of the individual's data protection rights

Information will usually be provided in a secure electronic format unless otherwise requested.

Information that may be withheld

Ysgol Y Rhos may withhold or redact information where disclosure would:

- Adversely affect the rights and freedoms of another individual
- Include personal data about a third party who has not consented to disclosure
- Prejudice the prevention or detection of crime
- Place a child at risk of harm
- Reveal confidential safeguarding or child protection information

Safeguarding information will be handled with particular care. In some cases, it may be appropriate to withhold or limit disclosure in order to protect a child or another individual.

Safeguarding considerations

Ysgol Y Rhos recognises that safeguarding information requires careful handling.

Where a Subject Access Request relates to safeguarding or child protection records, the School will:

- Consider the best interests of the child
- Seek advice from the Designated Safeguarding Person where appropriate
- Consider whether disclosure could cause harm

In some circumstances, safeguarding information may be disclosed in a limited or summary form, or withheld entirely where lawful and necessary.

Record keeping

Ysgol Y Rhos will keep a record of:

- All Subject Access Requests received
- The actions taken in response
- Any decisions to withhold or redact information
- Correspondence with the requester

These records form part of the School's accountability obligations under data protection law.

Complaints

If a requester is unhappy with how their Subject Access Request has been handled, they should raise the matter with the School in the first instance.

If concerns are not resolved, the requester has the right to complain to the Information Commissioner's Office (ICO).

This policy is reviewed every year as a minimum. However, where there are changes to legislation/guidance or in response to recommendation from any significant incident, review of the policy will take place immediately.

Policy Created By	Sam Thomas	09/01/2026
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