



**POLICY NAME: Subject access request**

**ADOPTED: June 2023**

**REVIEW PERIOD: September 2024**

**REVIEWER: C. Bolton**

## Policy Document Version Control

<b>Responsibility for Policy:</b>	Data Protection Officer
<b>Policy approval/date:</b>	July 23 (trust)
<b>Frequency of Review:</b>	Annual
<b>Next Review date:</b>	July 2024
<b>Related Policies:</b>	<p><i>Data protection policy</i></p> <p><a href="#">Rowan Learning Trust - GDPR &amp; Data Protection - All Documents (sharepoint.com)</a></p>
<b>Minor Revisions:</b>	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.
<b>Major changes</b>	<p><i>If during the indicated duration of the policy any major revisions/updates are made, these should be noted in brief summary here, including the date of the revision.</i></p> <p><i>This removes the need to fully review the policy where only major amendment/updating is required.</i></p> <p><i>Major revisions to policies should still be highlighted as part of the ongoing governance process for transparency.</i></p>
<b>Full re-write</b>	<i>If during the indicated duration of the policy a full re-write has been required, then please state the new date when the policy was completed and the reason for the new policy.</i>

## 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.

## **2. What is personal information?**

2.1 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**

3.1 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](mailto:DPO@rlt.education)

## **4 Making a subject access request**

4.1 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.

4.2 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/>.

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

5.1 Collating information – we will gather any manual 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?**

6.1 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

- 6.2 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.

## **7 Complaints procedure**

- 7.1 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@rlt.education](mailto:DPO@rlt.education)

- 7.2 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>

