



## SUBJECT ACCESS REQUESTS POLICY AND PROCEDURES

WORMHOLT PARK PRIMARY SCHOOL

REVIEWED:	SPRING 2024
NEXT REVIEW DATE:	SPRING 2028

## Contents

Statement.....	3
----------------	---

## Statement

Enabling individuals to find out what information the school holds about them, why we hold it and who we disclose it to is fundamental to good information-handling practice. The Data Protection Act 1998 gives individuals the right to request access to such information. The General Data Protection Regulations (GDPR), enforceable from 25th May 2018, strengthens individual's rights, including those covered under Subject Access Requests.

Wormholt Park Primary School is committed to protecting individuals through ensuring robust procedures are in place to ensure that the data of individuals is not compromised. Internal management and control procedures and policies are monitored by senior management.

This policy and procedures document outlines the rights of individuals to request access to personal data that the school may hold about them.

## Personal Data

Personal data is defined within GDPR as 'any information relating to an identifiable person who can be directly or indirectly identified'. In other words, any data we hold that could allow another individual to identify that person. This would include, but is not necessarily limited to:

- Name
- Address
- Date of Birth
- Telephone Number
- Email Address
- Unique Pupil Number
- National Insurance Number
- Passport Number

The personal data that Wormholt Park Primary School is set out within the school's Privacy Notices which are available from the school.

## The Right of Access

Under GDPR individuals have the right to obtain:

- confirmation that their data is being processed;
- access to their personal data; and
- other supplementary information

Requests for such information (subject access requests) must be made following the procedure outlined in the Procedures section of this policy.

## Subject Access Requests Procedures

In the event that a parent, carer or staff member wishes to pursue their right to obtain information that the school holds about them, they are required to follow the procedures

below. Wormholt Park Primary School shall also adhere to the internal procedures detailed.

### Making a Subject Access Request

Any individual wishing to access information about the data we hold are required to make such request in writing. Where possible, we ask that the Subject Access Request form is completed and sent to the school by post, pupil post or email, for the attention of the Head of School Business. In the event that the individual is unable to access the form he or she may submit their request through standard post or email. The school shall not accept verbal requests.

### Verifying Identity of Individual

In order to continue its commitment to protecting individuals, staff at Wormholt Park Primary School shall, on receipt of a request, contact the individual that has requested the information, by telephone in order to verify the identity and authenticity of the request.

### Timescale

Upon receipt of the subject access request the school shall contact the individual for verification purposes within 3 working days. The information shall be supplied to the individual within one month from the date of receipt of the request. Wormholt Park Primary School reserves the right to extend this period by a further two months, upon consultation with the individual, where the request is complex or excessive.

### Fees

The GDPR states that organisations (including schools) shall not charge a fee for provision of access unless the request is manifestly unfounded or excessive, particularly because they are repetitive. In accordance with this Wormholt Park Primary School shall not charge a fee where the request is reasonable but reserves the right to charge a reasonable fee, calculated on the time required to fulfil the requirements of the request. In this event the individual will be informed within one month of the date that the request was received.

### Refusal to respond

The school has the right to refuse to respond to a request that is manifestly unfounded or excessive. In the event that the school refuses to respond it will inform the individual, without undue delay and within one month, of the reason for the refusal and their right to complain.

### How the information is issued

Information may be supplied electronically or in paper format. An analysis will be made to determine which of the formats is the most appropriate and the decision will be agreed between the person making the request and the school. In the event that the information is supplied electronically it will be provided in PDF format.

Subject Access Requests will, at all times, be managed by a member of the administrative team.