



Subject Access Request Procedure GDPR_DOC_2.2

| Policy Version Control | |
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| Policy type | Academy Trust |
| Policy prepared by (name and designation) | Heather Ferguson Director of Operations |
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Document Owner & Approval

The Data Protection Officer is the owner of this document and is responsible for ensuring that this policy document is reviewed in line with the review requirements stated above.

A current version of this document is available to all members of staff on the Trust Shared Area.

This manual was approved by the Board of Trustees on 15th May 2018 and is issued on a version controlled basis under the signature of GDPR Trustee.

Signature:

Date:

1. Scope

All personal data processed by Lingfield Education Trust is within the scope of this procedure.

Data subjects are entitled to obtain:

- Confirmation as to whether Lingfield Education Trust is processing any personal data about that individual;
- The purpose(s) of Lingfield Education Trust processing any personal data about that individual;
- Making aware of their rights as data subjects (complaints, withdrawal of consent, rectification and erasure);
- The categorise of personal data concerned;
- Retention period of storing the data;
- The source of the information if not collected from the data subject;
- Access to their personal data;
- Any related information;

2. Responsibilities

- 2.1 The Data Protection Officer (DPO) is responsible for the application and effective working of this procedure, and for reporting to the information owners on Subject Access Requests (SARs).
- 2.2 The Data Protection Officer (DPO) is responsible for handling all SARs.

3. Procedure

- 3.1 Subject Access Requests are made using the Subject Access Request Record ([GDPR REC 4.2](#)).
- 3.2 The data subject provides Lingfield Education Trust with evidence of their identity via two forms of identification which can be:
 - 3.2.1 Current passport.
 - 3.2.2 Driving license.
 - 3.2.3 Utility bill (from last 3 months).
 - 3.2.4 Current vehicle registration document.
 - 3.2.5 Birth certificate.
- 3.3 The data subject's signature on their identity must be cross-checked to that on the application form GDPR REC 4.2.
- 3.4 The data subject specifies to Lingfield Education Trust specific set of data held by Lingfield Education Trust on their subject access request (SAR). The data subject can request all data held on them.
- 3.5 Lingfield Education Trust records the date that the identification checks were conducted and the specification of the data sought.

- 3.6 Lingfield Education Trust provides the requested information to the data subject within one month from this recorded date. Under the GDPR Article 12 (3), that period may be extended by two further months where necessary, taking into account the complexity and number of the requests. Lingfield Education Trust shall inform the data subject of any such extension within one month of receipt of the request, together with the reasons for the delay. Where the data subject makes the request by electronic form means, the information shall be provided by electronic means where possible, unless otherwise requested by the data subject.
- 3.7 Once received, the subject access request (SAR) application is immediately forwarded to the Data Protection Officer (DPO), who will ensure that the requested data is collected within the specified time frame in clause 3.4 above.
Collection entails:
- 3.7.1 Collecting the data specified by the data subject, or
- 3.7.2 Searching all databases and all relevant filing systems (manual files) in Lingfield Education Trust, including all back up and archived files (computerised or manual) and all email folders and archives. The Data Protection Officer (DPO) maintains a data map that identifies where all data in Lingfield Education Trust is stored.
- 3.8 The Data Protection Officer (DPO) maintains a record of requests for data and of its receipt, including dates.
- 3.9 The Data Protection Officer (DPO) reviews subject access requests from a child. Before responding to a SAR of the child data subject the Data Protection Officer (DPO) considers their ability to making the request by adequately explaining any implications of sharing their personal data, etc.
- 3.10 The Data Protection Officer (DPO) reviews all documents that have been provided to identify whether any third parties are present in it, and either removes the identifying third party information from the documentation or obtains written consent from the third party for their identity to be revealed.
- 3.11 If any of the requested data is being held or processed under one of the following exemptions, it does not have to be provided:
- National security
 - Crime and taxation
 - Health
 - Education
 - Social Work
 - Regulatory activity
 - Journalism, literature and art
 - Research history, and statistics
 - Publicly available information
 - Corporate finance
 - Examination marks
 - Examinations scripts
 - Domestic processing
 - Confidential references
 - Judicial appointments, honours and dignities

- Crown of ministerial appointments
- Management forecasts
- Negotiations
- Legal advice and proceedings
- Self-incrimination
- Human fertilization and embryology
- Adoption records
- Special educational needs
- Parental records and reports

3.12 In the event that a data subject requests Lingfield Education Trust to provide them with the personal data stored by the controller/processor, then Lingfield Education Trust will provide the data subject with the requested information in electronic format, unless otherwise specified. All of the items provided to the data subject are listed on this schedule Subject Access Request Record - GDPR_REC_4.2) that shows the data subject's name and the date on which the information is delivered to and received by the data subject.

3.13 In the event that a data subject requests what personal data is being processed then Lingfield Education Trust provides the data subject with the following information:

3.13.1 Purpose of the processing

3.13.2 Categories of personal data

3.13.3 Recipient(s) of the information, including recipients in third countries or international organisations

3.13.4 How long the personal data will be stored

3.13.5 The data subject's right to request rectification or erasure, restriction or objection, relative to their personal data being processed.

3.13.5.1 Lingfield Education Trust removes personal data from systems and processing operations as soon as a request for erasure has been submitted by the data subject.

3.13.5.2 Lingfield Education Trust contacts and communicates with other organisations, where the personal data of the data subject is being processed, to cease processing information at the request of the data subject.

3.13.5.3 Lingfield Education Trust takes appropriate measures without undue delay in the event that the data subject has: withdrawn consent (GDPR-REC 4.6A); objects to the processing of their personal data in whole or part; no longer under legal obligation and/or has been unlawfully processed.

3.13.6 Inform the data subject of their right to lodge a complaint with the supervisory authority and a method to do.

3.13.7 Information on the source of the personal data if it hasn't been collected from the data subject.

3.13.8 Inform the data subject of any automated decision-making.

3.13.9 If and where personal data has been transferred and information on any safeguards in place.

3.14 Lingfield Education Trust uses the following electronic formats to respond to SARs:

3.14.1 PDF

3.14.2 RTF

Policy Review Date: Summer 2020

1. DATA SUBJECT DETAILS:

GDPR_REC_4.2

| | | | | | |
|---|--|------------------------------|-------------------------------|-----------------------------|---------------------------------|
| Title: | Mr <input type="checkbox"/> | Mrs <input type="checkbox"/> | Miss <input type="checkbox"/> | Ms <input type="checkbox"/> | Other: <input type="checkbox"/> |
| Surname: | | | | | |
| First name(s): | | | | | |
| Current address: | | | | | |
| Telephone number: | Home: | | | | |
| | Work: | | | | |
| | Mobile: | | | | |
| Email address: | | | | | |
| Date of birth: | | | | | |
| Details of identification provided to confirm name of data subject (two forms required): | Passport | <input type="checkbox"/> | | | |
| | Driving Licence | <input type="checkbox"/> | | | |
| | Birth certificate | <input type="checkbox"/> | | | |
| | Utility bill (from last 3 months) | <input type="checkbox"/> | | | |
| | Bank statement (from last 3 months) | <input type="checkbox"/> | | | |
| | Rent book (from last 3 months) | <input type="checkbox"/> | | | |
| Authorisation that Identity has been confirmed by member of Lingfield Education Trust Staff: | Signed: | | | | |
| | Print: | | | | |
| | Date | | | | |
| | Position: | | | | |
| Details of data requested: | | | | | |

1.1 DETAILS OF PERSON REQUESTING THE INFORMATION (if not the data subject):

| | | | | | |
|--|-----------------------------|------------------------------|-------------------------------|-----------------------------|---------------------------------|
| Are you acting on behalf of the data subject with their written or other legal authority? | | Yes <input type="checkbox"/> | | | |
| | | No <input type="checkbox"/> | | | |
| If 'Yes' please state your relationship with the data subject (e.g. parent, legal guardian or solicitor) | | | | | |
| Please enclose proof that you are legally authorised to obtain this information. | | | | | |
| Title | Mr <input type="checkbox"/> | Mrs <input type="checkbox"/> | Miss <input type="checkbox"/> | Ms <input type="checkbox"/> | Other: <input type="checkbox"/> |
| Surname | | | | | |
| First name(s) | | | | | |
| Current address | | | | | |
| Telephone number: | Home: | | | | |
| | Work: | | | | |
| | Mobile: | | | | |
| Email address | | | | | |

2. DECLARATION

I,, the undersigned and the person identified in (1) above, hereby request that Lingfield Education Trust provide me with the data about me identified above.

Signature:

Date:

SAR form completed by (employee name):

I,, the undersigned and the person identified in (1.1) above, hereby request that Lingfield Education Trust provide me with the data about the data subject identified in (1) above.

Signature:

Date:

SAR form completed by (employee name):

This form must immediately be forwarded to Lingfield Education Trust Data Protection Officer (DPO).