



Subject Access Request – Process & Protocol

Last Reviewed: September 2025

Next Review: September 2027

Implementation from: October 2025

Cycle: Two Years

Version: 2.0



### **Subject Access Request – Process & Protocol**

As an organisation we collect and process data about individuals. We explain what information we collect, and why in our Privacy Notices.

Any individual, or person with parental responsibility, or young person with sufficient capacity to make a request is entitled to ask what information is held. Copies of the information shall also be made available on request. A subject access can be made either verbally or by writing via email, direct message on the school's social media platforms or via writing to the trust/school office.

It is recommended that all staff members, particularly those interacting with students, parents, or the public, will receive training to recognise SARs (including informal requests via social media or verbal queries)

We acknowledge that a request may be made to any member of staff within the Trust/School however we kindly ask that when making a request this be directed to the data protection/compliance lead for the specific school as outlined in Appendix 1. This will aid in the effective and timely handling of your request. When we receive a subject access request, for security, the trust/school may seek to confirm the identity of the person who is making the request. Discretion may be applied to requests received by employees and/or individuals who are known to the school. Exemptions to providing information following a SAR exist and may 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

Exemptions will be applied narrowly and only where strictly necessary. For example:

- Education records: Exam scripts/marks may be withheld under DPA 2018 Schedule 11.
- Safeguarding: Information may be redacted if disclosure risks harm to the data subject or others.
- All exemption applications will be documented and reviewed by the Data Protection Officer (DPO).

Where personal data identifies third parties (e.g., staff or students), we will redact this information unless:

- Consent is obtained from the third party, or
- Disclosure is reasonable and lawful without consent (e.g., public interest).



Responses will be provided within one calendar month. This may be extended by two additional months for complex requests, provided the requester is informed within the initial month, with reasons (e.g., technical complexity, multiple requests).

A reasonable fee may be charged if the request is manifestly unfounded or excessive (e.g., repetitive, disruptive). The fee will be calculated based on administrative costs.

Students aged 13+ with sufficient maturity may submit SARs independently. We will assess capacity on a case-by-case basis, considering their understanding of the request.

**All Data Subjects have the Right to Know: -**

- What information is held?
- Who holds it?
- Why is it held?
- The retention period of the information requested?
- That each data subject has rights. Consent can be withdrawn at any time (to some things)
- A right to request rectification, erasure or to limit or stop processing • A right to complain

Much of this will be contained within the Privacy Notices on the website.

The information will be provided in an electronic format, usually within one calendar month of the request. However, in some circumstances, for example the school is closed for holidays, this may be extended by up to another calendar month.

If a request is refused, we will:

- Explain the exemption/reason in writing.
- Inform the requester of their right to complain to the ICO within three months.
- Retain a record of the refusal rationale for six years.

Following delivery of the information the requester has the right to ask for a review or use the complaint process if they feel that information has not been provided.

**Review**

A review of the effectiveness of UK GDPR compliance and processes will be conducted by the Data Protection Officer every two years. The next review will take place in September 2027.



## Appendices

Appendix 1 – Data Protection Compliance Lead

### Appendix 1 – Data Protection Compliance Leads

St Francis CMAT – Lisa Parkin – [admin@stfranciscmat.com](mailto:admin@stfranciscmat.com)

Our Lady of Mount Carmel – Philippa Martin [head@olmcprimary.co.uk](mailto:head@olmcprimary.co.uk)

St Joseph's Catholic Primary School, Nottingham – Richard Hilton - [head@st-josephs.notts.sch.uk](mailto:head@st-josephs.notts.sch.uk)

St Mary's Catholic Primary School – Vicky Sonko – [general@stmarysmaltby.org](mailto:general@stmarysmaltby.org)

St Peter's Catholic Primary School – Sharon Liddle - [admin@stpeterdoncaster.co.uk](mailto:admin@stpeterdoncaster.co.uk)

St Joseph's School A Catholic Voluntary Academy, Doncaster – Tina Black - [t.black@st-josephs.doncaster.sch.uk](mailto:t.black@st-josephs.doncaster.sch.uk)

Our Lady of Sorrows Catholic Voluntary Academy – Claire Lister – [Claire.lister@ourladysorrows.doncaster.sch.uk](mailto:Claire.lister@ourladysorrows.doncaster.sch.uk)

St Joseph's Catholic Primary School, Dinnington – Charlie Shelton – [office@stjosephsdinnington.co.uk](mailto:office@stjosephsdinnington.co.uk)

St. Mary's Catholic Primary School, Herringthorpe – Catherine Peace – [cpeace@smh.school](mailto:cpeace@smh.school)

St. Bede's Catholic Primary School – Mary Kay - [Enquiries@stbedescatholicprimary.co.uk](mailto:Enquiries@stbedescatholicprimary.co.uk)

Holy Family Catholic Primary School – Chriss Bratt – [cbratt@hfcps.co.uk](mailto:cbratt@hfcps.co.uk)

St. Patrick's Catholic Primary School – Mary Jenkinson – [admin@st-patricks.notts.sch.uk](mailto:admin@st-patricks.notts.sch.uk)

St. Bernard's Catholic High School – Sally Hoffman – [shoffman@sbch.org.uk](mailto:shoffman@sbch.org.uk)

St. Gerard's Catholic Primary School – Bernadette Baxter - [office@stgerardsprimary.org](mailto:office@stgerardsprimary.org)

Saint Pius X Catholic High School – Sharon Graham - [SGraham@saintpiusx.school](mailto:SGraham@saintpiusx.school)