

SUBJECT ACCESS REQUEST POLICY

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Statutory

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Reviewed and ratified by:

SECAT Leadership Team

Signed by Trust/Committee Chair



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December 2026

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Version History

V26.1	June 2026	• The format a SAR will be sent to a requester. • Addition of “Stopping the Clock” • Addition of “reasonable and proportionate” searches in line with Data (Use & Access) Act 2025 • Additional exemption added. • Additon information on school closure periods.
V25.1	January 2025	Updated resource: • Amended phrasing of how an individual can make a SAR, clarifying this can be a written or verbal request, but that a form has been provided to support individuals with making their request. • Removed specific job role of DPO as the individual who will respond to a SAR to allow schools/trusts to personalise this, to show which role within school will co-ordinate the SAR response (as in practice there will be a number of people involved with preparing the SAR response) • Amended phrasing of how a SAR response will be provided to explain that it will generally be provided in the format that the request was submitted by the individual (e.g. a SAR received by email will be responded to electronically and a hard copy letter will be responded to with a paper response). • Amended phrasing linked to extensions to require the school/trust to contact the individual at the earliest opportunity to explain why an extension is being applied, but that this should be at least one month following receipt of the request. • Amended phrasing linked to checking for ID to show that this may be requested, rather than it will need to be provided for every request. If the school/trust are certain that the individual making the request is who they say they are and has parental responsibility then an ID check is not likely to be required. • Added in examples of other exemptions that may be applied (and that are most commonly applied within SARs): • Third party data, for example information about other pupils or adults that are not the data subject or individual making the request • Data that could lead to a risk of harm to the data subject or individual making the request • Information that is not the personal data of the data subject or individual making the request • Management information • Records relating to a live investigation (e.g. an ongoing complaint, behaviour, grievance, disciplinary matter etc) • Updated the link that directs to the ICO detailed guidance on exemptions.

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Subject Access Requests

Any individual, person with parental responsibility or young person with sufficient capacity has the right to ask what data the trust / schools hold about them and can make a Subject Access Request (SAR).

A SAR can be made verbally or in writing but preferable for a SAR to be made using the 'Subject Access Request' form (Appendix A) is included within this policy to support individuals with making their request.

The trust and each school have a designated individual, the Data Protection Lead who will coordinate the response to a SAR.

The trust / schools are required to provide the individual with the data it holds on them within **one calendar month**. The SAR will be provided by default as a secure digital link, unless otherwise requested by the requester.

Identification

Evidence of the identity of the person making the request and their relationship to the pupil may be required prior to any disclosure of information. This should be recorded on the SAR Log (Appendix A, Part B).

"Stopping the Clock"

The one-month clock can be paused under the following specific circumstances:

- Identity Verification: If an organization needs to verify the identity of the individual requesting the SAR, the clock does not start until the required ID is provided.
- Clarification: If the request is too broad, the clock pauses while the organization asks for specification as to which exact information or processing activities are required.

Extension to the one month timeline

The trust / schools can extend the time to respond by a further two months if the request is complex or they have received a number of requests from the individual. The individual must be contacted at the earliest opportunity, but at least within one month of the trust / schools receiving their request and explain why the extension is necessary.

It is permissible to ask the individual who has made the request to be more specific about the information that they require in order to ensure that the information they are provided with meets their requirements rather than providing lots of information that may not be relevant to their query. In line with the Data (Use & Access) Act 2025, all searches must be "reasonable and proportionate".

Exemptions

Exemptions to a SAR may include:

- Third party data, for example information about other pupils or adults that are not the data subject or individual making the request
- Data that could lead to a risk of harm to the data subject or individual making the request

- Information that is not the personal data of the data subject or individual making the request
- Management information
- Records relating to a live investigation (e.g. an ongoing complaint, behaviour, grievance, disciplinary matter etc)
- Education, Health, Social Work records
- Examination marks and scripts
- Safeguarding records
- Special educational needs records
- 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 employment references which are marked as "Strictly Confidential"

For full details of exemptions to SARs please visit the ICO website: [A guide to the data protection exemptions | ICO](#)

PLEASE NOTE: During school closure periods, Subject Access Requests will be managed by the Trust. Please email admin@secat.co.uk

Appendix A

Subject Access Request (SAR) Form

Part A: Data Subject's Details (person whose information you are requesting)

Title:	
Full Name:	
Date of Birth:	
Address:	
Year Group (if pupil at school)	

Part B: Requestor Details

Title:	
Full Name:	
Address:	
Phone Number:	
Email Address:	
Evidence of Identity (e.g. passport, driving license):	Evidence Provided? Yes / No Details:
Status of Requestor:	Data Subject: Yes / No Parent or person with parental responsibility: Yes / No Other: Yes / No If you have selected 'yes' for 'Other', please outline your role here:

Part C: Details of Subject Access Request

Details of Data Being Requested:	
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Part D: Declaration

Option i

I ,, hereby request that trust / school provide the data requested about me.

Signed: _____ Date: _____

Option ii

I ,, hereby request that trust / school provide the data requested about (insert child's name) on the basis of the authority that I have.

Signed: _____ Date: _____