THE NEW GUILD TRUST

Subject Access Request Policy

POLICY

This policy has been adopted on behalf of all academy schools in The New Guild Trust:

Moorpark Junior School
Jackfield Infant School
Alexandra Junior School
Alexandra Infants' School

Approval and Review

Committee to Approve Policy	Trust Board
Date of Board / Academy Committee Approval	Dec 2025
Chair of Board / Academy Committee	Mrs L Eagle
Signature	*L Eagle*
Accounting Officer	Mrs K Peters
Signature	*K Peters*
Policy Review Period	12 months
Date of Policy Review	Dec 2026

Version Control			
Version	**Date Approved**	**Changes**	**Reason for Alterations (From and To)**
V1	Dec 2020		Initial policy
	Dec 2021	No changes	
	Dec 22	Request made to school	Updated with DPO recommendations
	Dec 23	No Changes	
	Dec 25	No Changes	

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Subject Access Request Process

APPENDIX A: Subject Access Request Form

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Subject Access Requests (SAR)

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

A SAR can be made using the 'Subject Access Request' form (Appendix A).

The CFO of the Trust has been designated as the person who will coordinate the response to a SAR, with support from the DPO.

The school is required to provide the individual with the data it holds on them within one calendar month. The school 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 within one month of the school receiving their request and explain why the extension is necessary.

The response to the SAR will be provided in an electronic form.

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.

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

Exemptions to a SAR 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

For full details of exemptions to a SAR please visit the ICO website: https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/exemptions/

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:	

Part D: Declaration

Option i

I , ……., hereby request that <school/academy> provide the data requested about me.

Signed:_____ Date:_____

Option ii

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

Signed:_____ Date:_____

Appendix B

Subject Access Request (SAR) Log

Data Subject	Request	Date of SAR	Date DPO notified	ID confirmed	Response Deadline	Extension to Deadline?	Data held by school	Any additional info from requestor?	Any info to be withheld?	Who auth'd with-holding info?	Response checked and approved by DPO
E.g. John Smith	All data held about this staff member	01/02/18	01/02/18	Passport seen 02/02/18	01/03/18	08/03/18: 1 week due to Feb ½ term.	Personnel file – hard copy Email correspondence about individual	JS clarified the request links to a grievance they have with their line manager	Redacted email correspondence to remove reference to other employees	DPO 20/02/18	DPO 01/03/18