

Subject Access Request Policy

Clarity Independent School

Bridge Barn Farm
Woodhill Road
Sandon
CM2 7SG

Clarity Independent School is committed to safeguarding...

"Our school is committed to our whole-school approach to safeguarding, which ensures that keeping children safe is at the heart of everything we do, and underpins all systems, processes and policies...We promote an environment where children and young people feel empowered to raise concerns and report incidents and we work hard in partnership with pupils, parents and caregivers to keep children safe."

Clarity Safeguarding Policy September 2025

Written by Debbie Hanson

This is version [5.1]

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Mid-Year Update: December 2025 for April 2025

Updated Name: Debbie Hanson

Aim

You have a right, under the General Data Protection Regulation, to access the personal data we hold on you. To do so, you should make a subject access request, and this policy sets out how you should make a request, and our actions upon receiving the request.

Definitions

“Personal data” is any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier, including your name.

“Special categories of personal data” includes information relating to:

- a) race
- b) ethnic origin
- c) politics
- d) religion
- e) trade union membership
- f) genetics
- g) biometrics (where used for ID purposes)
- h) health
- i) sex life or
- j) sexual orientation.

Making a Request

Although subject access requests may be made verbally, we would advise that a request may be dealt with more efficiently and effectively if it is made in writing. If you wish to make a request, please use the Subject Access Request form.

Requests that are made directly by you should be accompanied by evidence of your identity. If this is not provided, we may contact you to ask that such evidence be forwarded before we comply with the request.

Requests made in relation to your data from a third party should be accompanied by evidence that the third party is able to act on your behalf. If this is not provided, we may contact the third party to ask that such evidence be forwarded before we comply with the request.

Timescales

Usually, we will comply with your request without delay and at the latest within 40 days. Where requests are complex or numerous, we may contact you to inform you that an extension of time is required. The maximum extension period is two months.

Fee

We will normally comply with your request at no cost. However, if the request is manifestly unfounded or excessive, or if it is repetitive, we may contact you requesting a fee. This fee must be paid in order for us to comply with the request. The fee will be determined at the relevant time and will be set at a level which is reasonable in the circumstances.

In addition, we may also charge a reasonable fee if you request further copies of the same information.

Information You Will Receive

When you make a subject access request, you will be informed of:

- a) whether or not your data is processed and the reasons for the processing of your data;
- b) the categories of personal data concerning you;
- c) where your data has been collected from if it was not collected from you;
- d) anyone who your personal data has been disclosed to or will be disclosed to, including anyone outside of the EEA and the safeguards utilised to ensure data security;
- e) how long your data is kept for (or how that period is decided);
- f) your rights in relation to data rectification, erasure, restriction of and objection to processing;
- g) your right to complain to the Information Commissioner if you are of the opinion that your rights have been infringed;
- h) the reasoning behind any automated decisions taken about you.

Circumstances in which your request may be declined

We may decline to deal with your subject access request if it is manifestly unfounded or excessive, or if it is repetitive. Where it is our decision to refuse your request, we will contact you without undue delay, and at the latest within one month of receipt, to inform you of this and to provide an explanation. You will be informed of your right to complain to the Information Commissioner and to a judicial remedy.

We may also refuse to deal with your request, or part of it, because of the types of information requested. For example, information which is subject to legal privilege or relates to management planning is not required to be disclosed. Where this is the case, we will inform you that your request cannot be complied with and an explanation of the reason will be provided.

In addition, in accordance with the Data (Use and Access) Act June 2025 (DUAA), the school is now only obliged to conduct 'reasonable and proportionate' searches. For example, the Headteacher (Information Controller) may consider a request disproportionate if asked to provide:

- A search for all class registers containing a pupil's name over a period of years and may instead provide termly / annual reports on the pupil's attendance
- A search for every email a pupil sent or received during their time at school
- A search for a first name shared by multiple other pupils in school, without further context

Overall responsibility for SARs in **Clarity Independent School** rests with the Head Teacher:

Debbie Hanson, Head Teacher

Appendix 1: SAR Application Form

Date:

Subject Access Request Form for Clarity Independent School

Dear Data Protection Officer,

I wish to make a Subject Access Request as per below. Subject Access Requests relate to personal data relating to the person specified below and are verified by the photo ID provided alongside the request, to prevent fraud and 'blagging' offences (unless delivered by the requester by hand).

Item	Requester to complete below
Date	
Name (including any aliases if relevant)	
Phone	
Address	
In order to help us with your request, please give specific details about the data you wish to have access to and the context in which the information about you may have been processed.	
Dates from and to	
How would you like to receive the information (e.g. email or printed out?)	
Please send my information to (e.g. address or email address)	

I attach two forms of my photo ID to be used to identify me and ensure this request is from me personally rather than a third party.

Photo ID supplied (please say which ID has been supplied):.....

Yours sincerely

Signature:

Name: