

Data Subject Access Requests Policy

*A copy of this policy is published in the following areas:
The school's website*

Reviewed: November 2020

Date for review: December 2021

Approved by: Kieran Topping, Business Director

A. Related Truro School Policies

This policy is intended to ensure that subject access requests are processed correctly and securely, in accordance with the General Data Protection Regulation, which takes effect on 25 May 2018. It should be read along with the following policies:

- Complaints Policy;
- IT policies including - On Line Safety Policy, School Network and Internet Acceptable Use Policy; Use of Images Policy;
- Data Protection Policy.
- Data Retention Policy.
- Staff Privacy Notice.

B. What are Data Subject Access Requests (DSARs)?

Data Controllers must facilitate Data Subject Access Requests (DSARs) when requested to by data subjects. These rights are provided to data subjects under the General Data Protection Regulation (GDPR) from 25 May 2018. Data subjects have the right:

- to know what personal data is held about them;
- how the personal data is used;
- where it came from; and
- who else might also have access or use the data.

This right is not without limitations and exemptions.

C. Scope

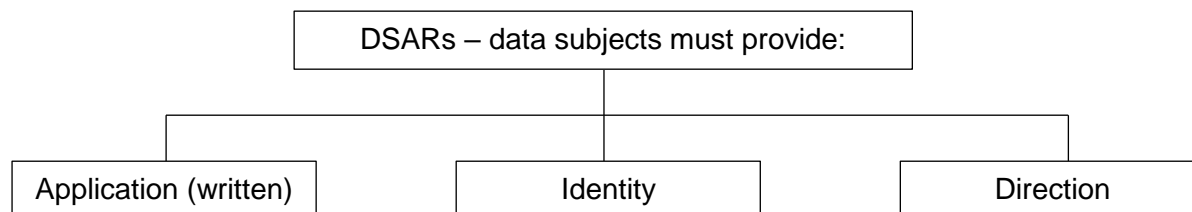
All data subjects past and present (staff, volunteers, pupils, parents, governors etc.) have the right to contact Truro School and make a DSAR. The DSAR must be answered within 1 calendar month.

Personal data includes correspondence, emails, minutes, reports, databases, lists, expressions of opinion and archives. Data subjects are entitled to a permanent copy of the personal data.

DSARs can be made by data subjects themselves or a third party acting on behalf of the data subject, Truro School must be satisfied of the identity of the data subject and/or that the third party is genuinely acting on behalf of the data subject. Children have the same rights to

make a DSAR as adults. A child of any age can also ask a parent or third party to make a DSAR on their behalf.

DSARs must be made in writing. A DSAR can be received via physical letter, email, online form. Truro School cannot insist on data subjects using the DSAR application form, but can request direction from the data subject as to what data they are requesting.



As mentioned above, Truro School will respond within 1 calendar month beginning when the written request reaches the Head's EA. The timeframe can be extended for complex DSARs but the data subject will receive an explanation for the extension.

All DSARs will need to be validated with proof of identity (certified copies of current passport/driving license). If a 3rd party is acting on behalf of a data subject, the data subject's proof of identity must be provided along with a signed and dated letter from the data subject authorising the 3rd party.

D. Limitations and Exemptions

Information may be exempt from disclosure if it:

- is legally privileged;
- records the intentions of the organisation in negotiations with the individual making the DSAR;
- consists of a confidential reference given by the organisation;
- is held for purposes of management planning (e.g. redundancy planning);
- would prejudice the prevention and detection of crime if disclosed (e.g. in live investigations); and
- might cause serious harm or distress in limited social work contexts.

Truro School will ensure the rights of all data subjects, this means that where personal data about the data subject making a DSAR also constitutes "personal data" about another person (a "third party"), Truro School is not obliged to disclose this mixed data in response to a DSAR unless either (a) the third party has consented or (b) it is "reasonable", taking into account all the relevant circumstances, to disclose without consent.

Truro School will redact information where necessary to protect the rights of third party data subjects, the data subject will be informed of the reason why the redaction has occurred.

Truro School may refuse DSARs that manifestly unfounded or excessive (repetitive).

E. Queries and Complaints

Any comments or queries on this policy should be directed to the Head (head@truroschoo.com).