

# TRURO SCHOOL

**PREP AND SENIOR SCHOOL**

## Data Subject Access Request Policy

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

Reviewed: September 2025

Date of next review: September 2026

Created by: Chief Operating Officer

Reviewed by: Chief Operating Officer

## **Data Subject Access Requests Policy**

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The school's website*

Date reviewed: February 2025

Date for next review: February 2026

Approved by: Chief Operating Officer

### **A. Related Truro School Policies**

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This policy is intended to ensure that Subject Access Requests are processed correctly and securely, in accordance with the General Data Protection Regulation (GDPR) and the Data Protection Act (2018) It should be read along with the following policies:

- Complaints Policy;
- IT policies including - E-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)?**

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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.) 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**

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All data subjects, past and present (staff, volunteers, pupils, parents, governors etc.) have the right to contact Truro School, via the Head of School or the School Data Protection Officer, and make a Data Subject Access Request (DSAR).

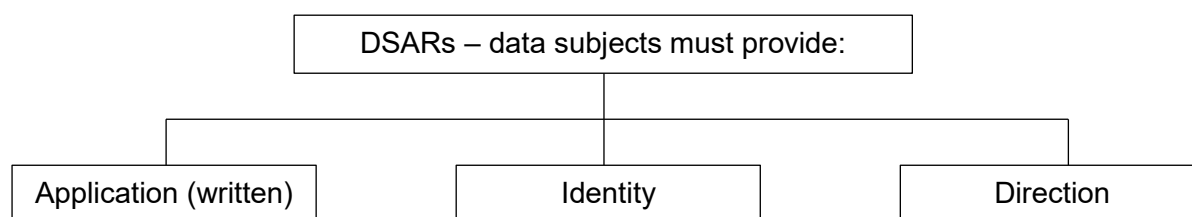
The DSAR must be answered within 1 calendar month. The school can ask for further information on the request to provide the most accurate data. If the school needs to seek clarification over the information requested, the timeframe mentioned above will start once the search parameters have been agreed, and if further clarifications are needed, this may extend the time. Also, the school may share the information in batches if the request is complex or large, always keeping the data subject updated in how this will be provided.

A DSAR may not always provide the answers or information that the data subjects are seeking, and therefore we will usually offer a meeting to discuss the situation in the first instance to help us clarify the request. 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, which always be provided electronically, for GDPR and data control purposes.

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.

The school will always carry out a test of best interest, which may include consulting the academic, pastoral or wider teams, to ensure the sharing of information is in the best interests of the pupil. We will also seek consent from the pupils if they are Gillick competent.

DSARs must be made in writing. A DSAR can be received via physical letter, email or online form. Truro School will 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 of School or the School Data Protection Officer. As mentioned above, 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.

Truro School may use a 3<sup>rd</sup> party to process or review the data on it's behalf, however the response will come directly from Truro School.

## **D. Limitations and Exemptions**

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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 or restructuring 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 are manifestly unfounded, excessive or repetitive.

## **E. Queries and Complaints**

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Any comments or queries on this policy should be directed to the Head ([head@truroschool.com](mailto:head@truroschool.com))