

Subject Access Requests (SARs) in Schools: The Action Plan

Accessing Data: A Legal Right (GDPR Article 15)

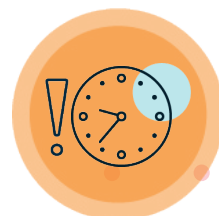
Under Article 15 of the GDPR, a Subject Access Request (SAR) is a request by an individual to access a copy of their personal data held by the school. This response should include:

- A copy of the personal data.
- Specific background information (e.g., purpose of processing, data categories).
- **Requesters:** SARs can be made by **pupils, parents, or staff.**
- **Format:** The request can be made **verbally and/or in writing.**
- **School Requirements:** Must be responded to **free of charge** and in an **accessible form.**



Critical Timeframe

- **Warning:** The GDPR does not take into account the school holidays.
- Schools must respond within **one month** of receiving the request.
- There is limited scope for extension in complex cases, up to an **additional two months.**



The 4-Step SAR Process Checklist

1. **Verification:** Verify the identity of the person making the request.
2. **Gathering:** Locate and gather all relevant personal data across school systems.
3. **Redaction and Basis:** Set out the legal basis for redacting (editing out) any personal data belonging to third parties or that is exempt.
4. **Delivery:** Respond and provide the data in an accessible format.



Special Case Warning: Health Data

- **Assessment Question:** Could the release of this health data cause **harm to the data subject** (the student)?
- If the SAR includes a student's health data the school **must** carry out an **assessment prior to release.**



Source: Data Protection Act 2018 (Access Modification) (Health) Regulations 2022.

