EDSTART SCHOOLS

SAR Policy

INFORMATION GOVERNANCE

Policy owner	EdStart Specialist Education Ltd
Applies to	EdStart Schools – All Sites
Category	Information governance
Approval and validity	September 2026 to September 2027
Review trigger	Annual review, or earlier following statutory, regulatory or operational change

Status: This 2026 version supersedes all previous versions.

1. Policy Statement

This is the subject access procedure of EdStart Specialist Education Limited ("Eds.EdStart"). We are committed to complying with requests for information, and respecting individual rights set under the UK General Data Protection Regulation (as defined in section 3(10) of the Data Protection Act 2018) (GDPR) and the Data Protection Act 2018 (DPA), and other laws and regulations which create important individual rights.

2. Application of this procedure

2.1 Parents, pupils, staff and other individuals who we process personal data about are entitled to access, subject to certain exceptions, the personal data which we hold about them.

2.2 When we receive a request for personal information, it is important that this procedure is followed.

3. Subject Access Procedure

3.1 Under the GDPR, individuals such as pupils, parents and staff are entitled to access personal data which we hold about them. The GDPR also sets out when such requests may be refused.

3.2 A subject access request should be made in writing to the HR/Data Lead.

3.3 On receipt of a subject access request, we will send a letter or email to the requester acknowledging receipt.

3.4 We will take steps to verify the identity of the requester, and where a parent requests personal data relating to their child, proof of their relationship to the child. We may require the requester to provide proof

of identity, such as a passport, driving licence and / or the child's birth certificate. This is a security measure to ensure that we only disclose personal data to those who are entitled to receive it.

3.5 We will respond to subject access requests as soon as possible, but in any event no later than 1 month from the receipt of the request subject to paragraph 3.6.

3.6 If the nature of the request is complex, or there are other legitimate reasons for doing so, we may, if necessary, extend the period under paragraph 3.5 for up to 2 months. If we require an extension of time of over 1 month to deal with a subject access request, we will inform the requester as soon as possible, but in any event no later than 1 month from the date that the request was made.

3.7 Before providing the information requested, we will review it to identify whether it contains any information relating to other individuals. Where other individuals are named, such as pupils, then we will redact this data to ensure that they are not identifiable. Generally, references to teacher names will not be redacted.

3.8 Where the personal data has been provided by another agency, such as the Police, Local Authority, Health Care professionals or another school we will obtain their consent first before disclosure.

3.9 We will not charge a fee for responding to subject access requests unless the request, in the opinion of the School, is unfounded, excessive and/or repetitive.

3.10 There are some exemptions to the right of access that apply in certain circumstances or to certain types of personal data. Therefore, all information must be reviewed prior to disclosure. The exemptions include the following:-

3.11 Personal data processed by a court and consisting of information supplied in a report or other evidence given to the court in the course of proceedings.

3.12 Personal data where the disclosure would be likely to cause serious harm to the physical or mental health or condition of the pupil or any other person.

3.13 Information as to whether the pupil is, or has been the subject of, or may be at risk of child abuse if disclosure would not be in their best interests. "Child abuse data" is personal data consisting of information as to whether the pupil is or has been the subject of, or may be at risk of, child abuse.

4. Additional Rights

4.1 Where an individual seeks to exercise additional rights such as the following:-

a. Right to rectification. b. Right of Erasure. c. Right of objection. d. Right to restrict processing. e. Right to data portability.

The DPO should be consulted immediately who will advise on the correct procedure to be followed.

5. Complaints

5.1 Complaints about this procedure should be made to Director of Education who will decide whether it is appropriate for the complaint to be dealt with in accordance with the our complaint procedure.

5.2 Complaints which are not appropriate to be dealt with through the complaint procedure can be dealt with by the Information Commissioner's Office. Contact details of both will be provided with the disclosure information.