Subject Access Request Policy

This policy should be read in conjunction with the School's Privacy Notice

Do you need to make a Subject Access Request?

If you only want information about a specific incident you may find that you can get that information by asking for it directly from the department holding it, without having to go through the Subject Access Request procedure. It is possible that the department may have to check whether the data can be released, but that shouldn't take too long. If the department is happy to release your data to you in this way, it will be a much shorter and less formal process than the Subject Access Request process. However, if you want information from a number of areas of the School the best way is still to use the Subject Access Request.

How to make a request

All SARs must be made in writing to the School. The School provides a <u>form</u> for such requests that is designed to collect the information needed to identify the data you are requesting. Download and complete the form and then send it, with the appropriate identification documents, either by post to the Bursar's Office, St John's College School, 75 Grange Road, Cambridge CB3 9AA, or by email to <u>achiano@sjcs.co.uk</u>. If you would prefer, you can bring original identification documents to the Bursar's Office in person. The School does not charge for this service.

What information do we need to start the search?

In order to find the data you are requesting we will need the following information:

Your...

- x name
- x address
- x date of birth
- x copy of passport or driving licence including photograph page
- x details of the information required

Identification is required to confirm that you are the data subject – that is, the individual to whom the data refers – so that the School does not disclose any data to someone who is not entitled to receive it.

If you are making a request on behalf of the data subject e.g. you are a solicitor acting on your client's behalf, you will need to provide the information detailed above for the data subject, plus proof that you have your client's consent to request and receive their persoh29hl Tw 02 (u 1c (u 1t)2.6 ()6.3 (l)4 pe)9.17 (nf)8.rt (he)9 (da)2.1 2.6 ()6 phenomenant of the data subject is a solicitor acting on your client's behalf, you will need to provide the information detailed above for the data subject, plus proof that you have your client's behalf,

What data will be provided to you?

You will receive copies of the personal data relating to you. Personal data is defined as data that identifies a living individual and relates to that individual. Therefore, the data you receive will not only name you but also have some reference to you. As the School still holds some paper files as well as electronic records, a search will be carried out initially for files / folders that are named using your name in any format. After that, electronic searches will be carried out for any electronic records that contain your name in the body of the data – not just the title. It is not always possible to carry out this search fully without any background information on the type of record you are looking for.

Whether you receive copies of particular emails will depend on whether the data may relate to you. So, for example, you will not receive copies of emails that have been sent to a list of email addresses including yours, where the information in the email does not relate to you, e.g. it is a reminder of a student and graduate employment fair open to everyone. However, you will receive a copy of an email that has been sent to a list of email addresses including yours, where the information in the email does relate to you.

Your personal data may be held in a document or database that contains personal data relating to other individuals. To avoid providing you with a third party's personal data, it may be necessary to redact the other person's data (that is, blank it out or obscure it in other ways) or to extract your data from the larger document / database. Therefore, you may receive copies of documents with blank spaces in the text, or with only one line of information under column headings. These are examples of redacted documents or where your data has been extracted.

Will you receive all of the data that relates to you?

It is important to note that it is not always possible to know exactly what information is held about an individual when a search is made. It may not always be possible for the School to provide every piece of information about your employment or studies, as there may have been some discussions relating to a final decision made at a meeting or over the telephone, which will not always be recorded. Emails are often seen as an informal method of communication and staff are encouraged to retain emails in line with their subject matter, but that does mean that not all emails will be kept for the same length of time. Therefore, an email in which someone agrees to attend a meeting does not need to be kept for as long as one that includes a decision on a particular subject that has ramifications for others or over a length of time.

- records the intentions of the school in negotiations with the individual making the SAR;
- · consists of confidential references either given or received by the school;
- consists of exam or test answers or exam results before the allotted publication time;
- 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);
- might cause serious harm or distress in limited social work contexts.

What can you do if you are unhappy with the response to your request?