



Data Subject Access Request (DSAR) Procedure

Swakeleys School for Girls

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Control Sheet

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1.2	Summer Term 2025	Kelda Stevenson	Dates updated
1.3	Summer Term 2026	Suzy Stevenson	Dates update, amended DPO title, added clauses 3.6 and 5.1

Data Subject Access Request (DSAR) Procedure

1. Introduction

- 1.1. A Data Subject Access Request (DSAR) is where an individual, using their rights under UK GDPR requests a copy of the personal data an organisation holds on them, or details of what data is held and its source. A Data Subject Access Request does not have to reference UK GDPR, the term 'Data Subject Access Request' or reference any legislative rights – it does, however, have to be a written request in order to be valid (however, reasonable adjustments may be made at the Data Protection Officer's discretion where dealing with accessibility issues).
- 1.2. This procedure should be read and applied in conjunction with Swakeleys School for Girls' Staffing Policy Statement where appropriate.

2. The UK General Data Protection Regulation (GDPR)

- 2.1. The UK General Data Protection Regulation (GDPR) was brought into EU law in May 2016 and became enforceable on 25 May 2018. The GDPR is a European regulation which means it automatically becomes applicable to all Member States. The UK is supporting this by introducing the Data Protection and Digital Information Bill.
- 2.2. GDPR entitles individuals to request access to any personal data that Swakeleys School for Girls is holding about them. This is known as a 'Data Subject Access Request.' This document is intended to give employees a guide to making a Data Subject Access Request (DSAR) and to what happens in processing DSARs.

3. The Process

- 3.1. All DSARs must be made in writing to Swakeleys School for Girls' Data Protection Contact at the address below. Where a request is received from elsewhere in the business, the Data Protection Contact should be immediately informed so they can deal with the request with no undue delay.
- 3.2. Once the request is received the Data Protection Contact will confirm the identity of the subject and assess the scope of the request. Once the identity of the data subject (or the right/authority to request the data where the data subject is not the requester) the Data Protection contact will begin the process of contacting the appropriate departments to collect and collate the information. In order to locate the correct information within Swakeleys School for Girls, the Data Protection contact may ask the subject to confirm exactly what information they are requesting, or where they believe the information may be stored. Where the request is deemed to be 'manifestly unfounded or vexatious', Swakeleys School for Girls may charge a reasonable fee or refuse to respond to the request. This will be confirmed to the data subject in writing.

- 3.3. The information provided in reply to a request must be that which Swakeleys School for Girls holds (subject to any exemptions) at the time the request is received. However, the Act allows routine updating and maintenance of the data to continue between the date on which the request is received and the date when the reply is dispatched. This means that the information provided to the individual may differ from that which was held at the time when your request was received, but only as a result of normal processing. Data cannot be deleted.
- 3.4. The school will contact any third parties (e.g. authors of e-mails/letters contained within the file) in order to obtain consent to disclose the information to the subject. Where consent cannot be obtained or is denied, the school will consider the reasons and Swakeleys School for Girls' duty of care to both parties to decide whether to disclose the information. Where the information contains a reference to third parties, the school will redact (blank out) the third parties. Where this is impossible and consent from the third party has not been received the information will not be disclosed.
- 3.5. All requests will be dealt with within one calendar month of receipt (minus any time spent verifying identity or authorisation to act on the subject's behalf) as per ICO requirements. The information will be dispatched to the subject as soon as the above process is complete.
- 3.6. As per ICO guidelines, DSAR requests on behalf of your child will require direct consent of your child if they are over the age of 12, in line with ICO guidelines.

4. Contacts and Complaints

- 4.1. Any enquiries regarding this procedure or Swakeleys School for Girls' Data Protection Policies should be directed to:

[Suzy Stevenson, Director of Operations & Compliance \(office@swakeleys.org.uk\)](mailto:office@swakeleys.org.uk)

If you require more information about the General Data Protection Regulation, the Data Protection Bill, or are unhappy with the way Swakeleys School for Girls has dealt with your request please contact:

The Information Commissioner
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
www.ico.org.uk

5. Review

- 5.1. This policy will be reviewed every 2 years or when the laws change.