DATA PROTECTION AND SUBJECT ACCESS REQUEST POLICY



Approved by the Governing Body on

Spring 2023

Review Date

Spring 2025

Model School Data Protection Policy:

Data Protection Policy

Lead member of staff	
Governor Committee	
Chair of Governors signature	
Date of publication	
Review date	

Introduction

On the 25th May 2018 the General Data Protection Regulation (GDPR) became applicable and the Data Protection Act 1998 (DPA) was updated by the new Data Protection Act 2018 giving effect to its provisions.

This Policy sets out the manner in which personal data of staff, students and other individuals is processed fairly and lawfully.

The School collects and uses personal information about staff, students, parents or carers and other individuals who come into contact with the School. This information is gathered in order to enable it to provide education and other associated functions. In addition, there may be a legal requirement to collect and use information to ensure that the School complies with its statutory obligations.

The School is a data controller and must therefore comply with the Data Protection Principles in the processing of personal data, including the way in which the data is obtained, stored, used, disclosed and destroyed. The School must be able to demonstrate compliance. Failure to comply with the Principles exposes the School and staff to civil and criminal claims and possible financial penalties.

Details of the School's purpose for holding and processing data can be viewed on the data protection register: https://ico.org.uk/esdwebpages/search

The Schools registration number is Z6547089. This registration is renewed annually and updated as and when necessary.

<u>Aim</u>

This Policy will ensure:

The School processes person data fairly and lawfully and in compliance with the Data Protection Principles.

All staff involved with the collection, processing and disclosure of personal data will be aware of their duties and responsibilities under this policy.

That the data protection rights of those involved with the School community are safeguarded.

Confidence in the School's ability to process data fairly and securely.

Scope

This Policy applies to:

Personal data of all School employees, governors, students, parents and carers, volunteers and any other person carrying out activities on behalf of the School.

The processing of personal data, both in manual form and on computer.

All staff and governors.

The Data Protection Principles

The School will ensure that personal data will be:

- 1. Processed fairly, lawfully and in a transparent manner.
- 2. Collected for specified, explicit and legitimate purposes and not further processed for other purposes incompatible with those purposes.
- 3. Adequate, relevant and limited to what is necessary in relation to the purposes for which data is processed.
- 4. Accurate and where necessary, kept up to date.
- 5. Kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed.
- Processed in a way that ensures appropriate security of the personal data including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

The School will be able to demonstrate compliance with these principles.

The School will have in place a process for dealing with the exercise of the following rights by Governors, staff, students, parents and members of the public in respect of their personal data:

 to be informed about what data is held, why it is being processed and who it is shared with;

- to access their data;
- to rectification of the record;
- to erasure;
- to restrict processing;
- to data portability;
- to object to processing;
- not to be subject to automated decision-making including profiling.

Roles and Responsibilities

The Governing Body of the School and the Head Teacher are responsible for implementing good data protection practices and procedures within the School and for compliance with the Data Protection Principles.

It is the responsibility of all staff to ensure that their working practices comply with the Data Protection Principles. Disciplinary action may be taken against any employee who breaches any of the instructions or procedures forming part of this policy

A designated member of staff, the Data Protection Officer, will have responsibility for all issues relating to the processing of personal data and will report directly to the Head Teacher.

The Data Protection Officer will comply with responsibilities under the GDPR and will deal with subject access requests, requests for rectification and erasure, data security breaches. Complaints about data processing will be dealt with in accordance with the Schools Complaints Policy.

Data Security and Data Security Breach Management

All staff are responsible for ensuring that personal data which they process is kept securely and is not disclosed to any unauthorised third parties.

Access to personal data should only be given to those who need access for the purpose of their duties.

All staff will comply with the Schools Acceptable IT use Policy.

Staff who work from home must have particular regard to the need to ensure compliance with this Policy and the Acceptable IT use Policy.

Data will be destroyed securely in accordance with the 'Information and Records Management Society Retention Guidelines for Schools'.

New types of processing personal data including surveillance technology which are likely to result in a high risk to the rights and freedoms of the individual will not be implemented until a Privacy Impact Risk Assessment has been carried out.

The School will have in place a data breach security management process and serious breaches where there is a high risk to the rights of the individual will be reported to the Information Commissioner's Office (ICO) in compliance with the GDPR.

All staff will be aware of and follow the data breach security management process.

All staff will be aware of and comply with the list of Do's and Don'ts in relation to data security in Appendix A

Subject Access Requests

Requests for access to personal data (Subject Access Requests)(SARs) will be processed by the Data Protection Officer. Generally, no fee is applicable. Records of all requests will be maintained.

The School will comply with the statutory time limits for effecting disclosure in response to a Subject Access Request. The statutory time period is one calendar month of receipt of the request.

Please see the Appendix at the end of this document for further detail regarding SAR policy and procedure.

<u>Sharing data with third parties and data processing undertaken on</u> behalf of the School.

Personal data will only be shared with appropriate authorities and third parties where it is fair and lawful to do so. Any sharing will be undertaken by trained personnel using secure methods. Where a third party undertakes data processing on behalf of the School e.g. by providing cloud based systems or shredding services, the School will ensure that there is a written agreement requiring the data to be processed in accordance with the Data Protection Principles.

Ensuring compliance

All new staff will be trained on the data protection requirements as part of their induction.

Training and guidance will be available to all staff.

All staff will read the Acceptable IT use Policy.

The School advises students whose personal data is held, the purposes for which it is processed and who it will be shared with. This is referred to as a "Privacy Notice" and is available on the School website.

The School also provides a Privacy Notice to staff which is available on the School website.

The School will ensure Privacy Notices contains the following information:

- Contact Data Controller and Data Protection Officer
- Purpose of processing and legal basis. Retentions period. Who we share data with.
- Right to request rectification, erasure, to withdraw consent, to complain, or to know about any automated decision making and the right to data portability where applicable.

Photographs, Additional Personal Data and Consents

Where the School seeks consents for processing person data such as photographs at events it will ensure that appropriate written consents are obtained. Those consent forms will provide details of how the consent can be withdrawn.

Where the personal data involves a child under 16 years written consent will be required from the adult with parental responsibility.

Data Protection Officer (DPO)

Please find below details of the School's Data Protection Officer: -

Data Protection Officer: Judicium Consulting Limited Address: 72 Cannon Street, London, EC4N 6AE

Email: dataservices@judicium.com Web: www.judiciumeducation.co.uk

Telephone: 0203 326 9174 Lead Contact: Craig Stilwell

The DPO is responsible for overseeing this Data Protection Policy and developing datarelated policies and guidelines.

Please contact the DPO with any questions about the operation of this Data Protection Policy or the UK GDPR or if you have any concerns that this policy is not being or has not been followed. In particular, you must always contact the DPO in the following circumstances: -

- (a) If you are unsure of the lawful basis being relied on by the School to process personal data;
- (b) If you need to rely on consent as a fair reason for processing (please see below the section on consent for further detail);
- (c) If you need to draft privacy notices or fair processing notices;
- (d) If you are unsure about the retention periods for the personal data being processed but we would refer you to the School's Data Retention Policy in the first instance
- (e) If you are unsure about what security measures need to be put in place to protect personal data;
- (f) If there has been a personal data breach and would refer you to the procedure set out in the School's Data Breach Policy
- (g) If you are unsure on what basis to transfer personal data outside the EEA;
- (h) If you need any assistance dealing with any rights invoked by a data subject;

- (i) Whenever you are engaging in a significant new (or a change in) processing activity which is likely to require a data protection impact assessment or if you plan to use personal data for purposes other than what it was collected for;
- (j) If you plan to undertake any activities involving automated processing or automated decision making;
- (k) If you need help complying with applicable law when carrying out direct marketing activities;
- (I) If you need help with any contracts or other areas in relation to sharing personal data with third parties.

Appendix A

What staff should do:

DO get the permission of your manager to take any confidential information home.

DO transport information from school on secure computing devices (i.e. encrypted laptops and encrypted memory sticks). Wherever possible avoid taking paper documents out of the office.

DO use secure portable computing devices such as encrypted laptops and encrypted USB memory sticks when working remotely or from home.

DO ensure that any information on USB memory sticks is securely deleted off the device, or saved on a School shared drive.

DO ensure that all paper based information that is taken of premises is kept confidential and secure, ideally in a sealed envelope which indicates a return address if misplaced.

DO ensure that any confidential documents that are taken to your home are stored in a locked drawer.

DO ensure that paper based information and laptops are kept safe and close to hand when taken out off premises. Never leave them unattended. Particular care should be taken in public places (e.g. reading of documentation on public transport).

DO ensure that when transporting paper documentation in your car that it is placed in the boot (locked) during transit.

DO return the paper based information to the School as soon as possible and file or dispose of it securely.

DO report any loss of paper based information or portable computer devices to your line manager immediately.

DO ensure that all postal and e-mail addresses are checked to ensure safe dispatch of information. When sending personal information by post the envelope should clearly state 'Private – Contents for Addressee only'.

DO ensure that when posting/emailing information that only the specific content required by the recipient is sent.

DO use pseudonyms and anonymise personal data where possible.

DO ensure that access to Bromcom is restricted to appropriate staff only, that leavers are removed in a timely manner and that generic user names such as 'Sysman' are disabled.

What staff must not do:

DO NOT take confidential information to an entertainment or public place such as a pub or cinema, whether held on paper or an electronic device. Any information must be taken to the destination directly and never left unattended during the journey.

DO NOT unnecessarily copy other parties into e-mail correspondence.

DO NOT e-mail documents to your own personal computer.

DO NOT store work related documents on your home computer.

DO NOT leave personal information unclaimed on any printer or fax machine.

DO NOT leave personal information on your desk over night, or if you are away from your desk in meetings.

DO NOT leave documentation in vehicles overnight.

DO NOT discuss case level issues at social events or in public places. **DO NOT** put confidential documents in non-confidential recycling bins. DO NOT print off reports with personal data (e.g. pupil data) unless absolutely necessary. **DO NOT** use unencrypted memory sticks or unencrypted laptops © West Sussex County Council Spring 2023

Appendix B - Subject Access Requests

Under Data Protection Law, data subjects have a general right to find out whether the School hold or process personal data about them, to access that data, and to be given supplementary information. This is known as the right of access or the right to make a data subject access request (SAR). The purpose of the right is to enable the individual to be aware of and verify the lawfulness of the processing of personal data that the School are undertaking.

This appendix provides guidance for staff members on how data subject access requests should be handled and for all individuals on how to make a SAR.

Failure to comply with the right of access under UK GDPR puts both staff and the School at potentially significant risk and so the School takes compliance with this policy very seriously.

A data subject has the right to be informed by the School of the following: -

- (a) Confirmation that their data is being processed;
- (b) Access to their personal data;
- (c) A description of the information that is being processed;
- (d) The purpose for which the information is being processed;
- (e) The recipients/class of recipients to whom that information is or may be disclosed;
- (f) Details of the School's sources of information obtained;
- (g) In relation to any personal data processed for the purposes of evaluating matters in relation to the data subject that has constituted or is likely to constitute the sole basis for any decision significantly affecting him or her, to be informed of the logic of the Data Controller's decision making. Such data may include, but is not limited to, performance at work, creditworthiness, reliability and conduct; and
- (h) Other supplementary information.

How to Recognise a Subject Access Request

A data subject access request is a request from an individual (or from someone acting with the authority of an individual, e.g., a solicitor or a parent making a request in relation to information relating to their child):

- for confirmation as to whether the School process personal data about him or her and, if so
- for access to that personal data
- and/or certain other supplementary information

A valid SAR can be both in writing (by letter, email, WhatsApp text) or verbally (e.g., during a telephone conversation). The request may refer to the UK GDPR and/or to 'data protection' and/or to 'personal data' but does not need to do so in order to be a valid request. For example, a letter which states 'please provide me with a copy of information that the School hold about me' would constitute a data subject access request and should be treated as such.

A data subject is generally only entitled to access their own personal data and not information relating to other people.

How to Make a Data Subject Access Request

Whilst there is no requirement to do so, we encourage any individuals who wish to make such a request to make the request in writing, detailing exactly the personal data being requested. This allows the School to easily recognise that you wish to make a data subject access request and the nature of your request. If the request is unclear/vague we may be

required to clarify the scope of the request which may in turn delay the start of the time period for dealing with the request.

What to do When You Receive a Data Subject Access Request

All data subject access requests should be immediately directed to the School Business Manager who should contact Judicium as DPO in order to assist with the request and what is required. There are limited timescales within which the School must respond to a request and any delay could result in failing to meet those timescales, which could lead to enforcement action by the Information Commissioner's Office (ICO) and/or legal action by the affected individual.

Acknowledging the Request

When receiving a SAR the School shall acknowledge the request as soon as possible and inform the requester about the statutory deadline (of one calendar month) to respond to the request.

In addition to acknowledging the request, the School may ask for:

- proof of ID (if needed);
- further clarification about the requested information;
- if it is not clear where the information shall be sent, the School must clarify what address/email address to use when sending the requested information; and/or
- consent (if requesting third party data).

The School should work with their DPO in order to create the acknowledgment.

Verifying the Identity of a Requester or Requesting Clarification of the Request

Before responding to a SAR, the School will take reasonable steps to verify the identity of the person making the request. In the case of current employees, this will usually be straightforward. The School is entitled to request additional information from a requester in order to verify whether the requester is in fact who they say they are. Where the School has reasonable doubts as to the identity of the individual making the request, evidence of identity may be established by production of a passport, driving license, a recent utility bill with current address, birth/marriage certificate, credit card or a mortgage statement. If an individual is requesting a large amount of data the School may ask the requester for more information for the purpose of clarifying the request, but the requester shall never be asked why the request has been made. The School shall let the requestor know as soon as possible where more information is needed before responding to the request.

In both cases, the period of responding begins when the additional information has been received. If the School do not receive this information, they will be unable to comply with the request.

Requests Made by Third Parties or on Behalf of Children

The school need to be satisfied that the third party making the request is entitled to act on behalf of the individual, but it is the third party's responsibility to provide evidence of this entitlement. This might be a written authority to make the request or it might be a more general power of attorney. The School may also require proof of identity in certain circumstances.

If the School is in any doubt or has any concerns as to providing the personal data of the data subject to the third party, then it should provide the information requested directly to the data subject. It is then a matter for the data subject to decide whether to share this information with any third party.

When requests are made on behalf of children, it is important to note that even if a child is too young to understand the implications of subject access rights, it is still the right of the child, rather than of anyone else such as a parent or guardian, to have access to the child's personal data. Before responding to a SAR for information held about a child, the School should consider whether the child is mature enough to understand their rights. If the school is confident that the child can understand their rights, then the School should

usually respond directly to the child or seek their consent before releasing their information.

It shall be assessed if the child is able to understand (in broad terms) what it means to make a subject access request and how to interpret the information they receive as a result of doing so. When considering borderline cases, it should be taken into account, among other things:

- the child's level of maturity and their ability to make decisions like this;
- the nature of the personal data;
- any court orders relating to parental access or responsibility that may apply;
- any duty of confidence owed to the child or young person;
- any consequences of allowing those with parental responsibility access to the child's
 or young person's information. This is particularly important if there have been
 allegations of abuse or ill treatment;
- any detriment to the child or young person if individuals with parental responsibility cannot access this information; and
- any views the child or young person has on whether their parents should have access to information about them.

Generally, a person aged 12 years or over is presumed to be of sufficient age and maturity to be able to exercise their right of access, unless the contrary is shown. In relation to a child 12 years of age or older, then provided that the School is confident that they understand their rights and there is no reason to believe that the child does not have the capacity to make a request on their own behalf, the School will require the written authorisation of the child before responding to the requester or provide the personal data directly to the child.

The School may also refuse to provide information to parents if there are consequences of allowing access to the child's information – for example, if it is likely to cause detriment to the child.

Fee For Responding to a SAR

The School will usually deal with a SAR free of charge. Where a request is considered to be manifestly unfounded or excessive a fee to cover administrative costs may be requested. If a request is considered to be manifestly unfounded or unreasonable the School will inform the requester why this is considered to be the case and that the School will charge a fee for complying with the request.

A fee may also be requested in relation to repeat requests for copies of the same information. In these circumstances a reasonable fee will be charged taking into account the administrative costs of providing the information.

If a fee is requested, the period of responding begins when the fee has been received.

Time Period for Responding to a SAR

The School has one calendar month to respond to a SAR. This will run from the day that the request was received or from the day when any additional identification or other information requested is received, or payment of any required fee has been received.

The circumstances where the School is in any reasonable doubt as to the identity of the requester, this period will not commence unless and until sufficient information has been provided by the requester as to their identity and in the case of a third party requester, the written authorisation of the data subject has been received.

The period for response may be extended by a further two calendar months in relation to complex requests. What constitutes a complex request will depend on the particular nature of the request. The DPO must always be consulted in determining whether a request is sufficiently complex as to extend the response period.

Where a request is considered to be sufficiently complex as to require an extension of the period for response, the School will need to notify the requester within one calendar month of receiving the request, together with reasons as to why this extension is considered necessary.

School Closure Periods

The school may not be able to respond to requests received during or just before school closure periods within the one calendar month response period. This is because we do not generally review emails during the periods when the school is closed. As a result, it is unlikely that your request will be able to be dealt with during this time. We may not be able to acknowledge your request during this time (i.e., until a time when we receive the request). However, if we can acknowledge the request, we may still not be able to deal with it until the School re-opens. The School will endeavour to comply with requests as soon as possible and will keep in communication with you as far as possible. If your request is urgent, please provide your request during term times and not during/close to closure periods.

Information to be Provided in Response to a Request

The individual is entitled to receive access to the personal data we process about him or her and the following information:

- the purpose for which we process the data;
- the recipients or categories of recipient to whom the personal data has been or will be disclosed, in particular where those recipients are in third countries or international organisations;
- where possible, the period for which it is envisaged the personal data will be stored, or, if not possible, the criteria used to determine that period;
- the fact that the individual has the right:
 - to request that the Company rectifies, erases or restricts the processing of his personal data; or
 - to object to its processing;
 - to lodge a complaint with the ICO;
 - where the personal data has not been collected from the individual, any information available regarding the source of the data;
 - o any automated decision we have taken about him or her together with meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for him or her.

The information should be provided in a way that is concise, transparent, easy to understand and easy to access using clear and plain language, with any technical terms, abbreviations or codes explained. The response shall be given in writing if the SAR was made in writing in a commonly used electronic format.

The information that the School are required to supply in response to a SAR must be supplied by reference to the data in question at the time the request was received. However, as the School have one month in which to respond the School is allowed to take into account any amendment or deletion made to the personal data between the time the request is received and the time the personal data is supplied if such amendment or deletion would have been made regardless of the receipt of the SAR.

Therefore, the School is allowed to carry out regular housekeeping activities even if this means deleting or amending personal data after the receipt of a SAR. The School is not allowed to amend or delete data to avoid supplying the data.

How to Locate Information

The personal data the School need to provide in response to a data subject access request may be located in several of the electronic and manual filing systems. This is why it is important to identify at the outset the type of information requested so that the search can be focused.

Depending on the type of information requested, the School may need to search all or some of the following:

- electronic systems, e.g., databases, networked and non-networked computers, servers, customer records, human resources system, email data, back up data, CCTV;
- manual filing systems in which personal data is accessible according to specific criteria, e.g., chronologically ordered sets of manual records containing personal data;
- data systems held externally by our data processors;
- occupational health records;
- pensions data;
- share scheme information;
- insurance benefit information.

The School should search these systems using the individual's name, employee number or other personal identifier as a search determinant.

Protection of Third Parties - Exemptions to the Right of Subject Access

There are circumstances where information can be withheld pursuant to a SAR. These specific exemptions and requests should be considered on a case by case basis.

The School will consider whether it is possible to redact information so that this does not identify those third parties. If their data cannot be redacted (for example, after redaction it is still obvious who the data relates to) then the School do not have to disclose personal data to the extent that doing so would involve disclosing information relating to another individual (including information identifying the other individual as the source of information) who can be identified from the information unless:

- the other individual has consented to the disclosure; or
- it is reasonable to comply with the request without that individual's consent.

In determining whether it is reasonable to disclose the information without the individual's consent, all of the relevant circumstances will be taken into account, including:

- the type of information that they would disclose;
- any duty of confidentiality they owe to the other individual;
- any steps taken to seek consent from the other individual;
- whether the other individual is capable of giving consent; and
- any express refusal of consent by the other individual.

It needs to be decided whether it is appropriate to disclose the information in each case. This decision will involve balancing the data subject's right of access against the other individual's rights. If the other person consents to the school disclosing the information about them, then it would be unreasonable not to do so. However, if there is no such consent, the school must decide whether to disclose the information anyway. If there are any concerns in this regard then the DPO should be consulted.

Other Exemptions to the Right of Subject Access

In certain circumstances the School may be exempt from providing some or all of the personal data requested. These exemptions are described below and should only be applied on a case-by-case basis after a careful consideration of all the facts.

Crime detection and prevention: The School do not have to disclose any personal data being processed for the purposes of preventing or detecting crime; apprehending or prosecuting offenders; or assessing or collecting any tax or duty.

Confidential references: The School do not have to disclose any confidential references given to third parties for the purpose of actual or prospective:

- education, training or employment of the individual;
- appointment of the individual to any office; or
- provision by the individual of any service

This exemption does not apply to confidential references that the School receive from third parties. However, in this situation, granting access to the reference may disclose the

personal data of another individual (i.e., the person giving the reference), which means that the School must consider the rules regarding disclosure of third-party data set out above before disclosing the reference.

Legal professional privilege: The School do not have to disclose any personal data which is subject to legal professional privilege.

Management forecasting: The School do not have to disclose any personal data processed for the purposes of management forecasting or management planning to assist us in the conduct of any business or any other activity.

Negotiations: The School do not have to disclose any personal data consisting of records of intentions in relation to any negotiations with the individual where doing so would be likely to prejudice those negotiations.

Refusing to Respond to a Request

The school can refuse to comply with a request if the request is manifestly unfounded or excessive, taking into account whether the request is repetitive in nature.

If a request is found to be manifestly unfounded or excessive the school can:

- request a "reasonable fee" to deal with the request; or
- refuse to deal with the request.

In either case the school need to justify the decision and inform the requestor about the decision.

The reasonable fee should be based on the administrative costs of complying with the request. If deciding to charge a fee the school should contact the individual promptly and inform them. The school do not need to comply with the request until the fee has been received.

Record Keeping

A record of all subject access requests shall be kept by the School Business Manager. The record shall include the date the SAR was received, the name of the requester, what data the School sent to the requester and the date of the response.

Appendix 2 - Subject Access Request Form

The Data Protection Act 2018 provides you, the data subject, with a right to receive a copy of the data/information we hold about you or to authorise someone to act on your behalf. Please complete this form if you wish to make a request for your data. Your request will normally be processed within one calendar month upon receipt of a fully completed form and proof of identity.

Proof of Identity

We require proof of your identity before we can disclose personal data. Proof of your identity should include a copy of a document such as your birth certificate, passport, driving licence, official letter addressed to you at your address e.g., bank statement, recent utilities bill or council tax bill. The document should include your name, date of birth and current address. If you have changed your name, please supply relevant documents evidencing the change.

Section 1

Please fill in the details of the data subject (i.e., the person whose data you are requesting). If you are not the data subject and you are applying on behalf of someone else, please fill in the details of the data subject below and not your own.

ise, piease fill in the	details of the data subject below and not your own.
Title	
Surname/Family Name	
First Name(s)/ Forename	
Date of Birth	
Address	
Post Code	
Phone Number	
Email address	

I am enclosing the following copies as proof of identity (please tick the relevant box):
□ Birth certificate
□ Driving licence□ Passport
☐ An official letter to my address
Personal Information
If you only want to know what information is held in specific records, please indicate in the box below. Please tell us if you know in which capacity the information is being held, together with any names or dates you may have. If you do not know exact dates, please give the year(s) that you think may be relevant.
Details:
Employment records:
If you are, or have been employed by the School and are seeking personal information in relation to your employment please provide details of your staff number, unit, team, dates of employment etc.
Details:

Section 2

Please complete this section of the form with your details if you are acting on behalf of someone else (i.e., the data subject).

If you are **NOT** the data subject, but an agent appointed on their behalf, you will need to provide evidence of your identity as well as that of the data subject and proof of your right to act on their behalf.

Title		
Surname/ Family Name		
First		
Name(s)/Forenames		
Date of Birth		
Address		
Post Code		
Phone Number		
I am enclosing the fol	lowing copies as proof of identity (please tick the relevant box):	
□ Birth certificat □ Driving licence □ Passport		
□ An official lette	er to my address	
what is your relative)	tionship to the data subject? (e.g., parent, carer, legal	
I am enclosing the fol data subject:	lowing copy as proof of legal authorisation to act on behalf of the	
□ Letter of authority □ Lasting or Enduring Power of Attorney □ Evidence of parental responsibility □ Other (give details):		
Section 3		
Please describe as detailed as possible what data you request access to (e.g., time period, categories of data, information relating to a specific case, paper records, electronic records).		

Ī	Receive the information by post* Receive the information by email Collect the information in person View a copy of the information only Go through the information with a member of staff
ir y	*Please be aware that if you wish us to post the information to you, we will take every care to ensure that it is addressed correctly. However, we cannot be held liable if the information is lost in the post or incorrectly delivered or opened by someone else in your household. Loss or incorrect delivery may cause you embarrassment or harm if the information is 'sensitive'.

Please send your completed form and proof of identity by email to: ${\tt sbm@holbrookprimaryschool.com}$