



Maharishi School

CONSCIOUSNESS-BASED EDUCATION

SUBJECT ACCESS PROCEDURE

(To be approved)

Date policy last reviewed: May 2026

Signed by:

_____ Headteacher Date: _____

_____ Chair of governors Date: _____

Next review due: May 2027

1. Policy Statement

This is the subject access procedure of Maharishi School ("the School"). We are committed to complying with requests for information, and respecting individual rights set under the UK General Data Protection Regulation (the retained EU law version of the General Data Protection Regulation (EU) 2016/679) (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 the School receives 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 Headteacher.
- 3.3 On receipt of a subject access request, we will send a letter or email to the requester acknowledging receipt.
- 3.4 Where necessary, we will take steps to verify the identity of the requester, and;
- 3.5 Where the request is received from a pupil or former pupil then, as a general rule, if they are aged 13 or older, we will deem them to be able to understand the request that they are making. However, If the child cannot understand the nature of the request, someone with parental responsibility may ask for the information on the child's behalf. All requests will be dealt with on a case-by-case basis and the DPO should be consulted where appropriate.
- 3.6 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 3.7.
- 3.7 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 3.6 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.
- 3.8 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.
- 3.9 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.
- 3.14 If there are concerns over the disclosure of information, then additional advice should be sought from the DPO.

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.
- 4.2 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 Headteacher who will investigate the complaint outside the School's usual complaints procedure.
- 5.2 Complaints which are not satisfied at School level can be dealt with by the Information Commissioner's Office. Contact details will be provided with the disclosure information.