# SUBJECT ACCESS REQUEST POLICY

Respecting rights. Protecting information.
Responding lawfully.



## RIVERSIDE BRIDGE SCHOOL

INSPIRE, EMPOWER, ACHIEVE

This policy forms part of the Riverside Bridge School Policy Framework
and should be read alongside any related policies, procedures and guidance.

RIVERSIDE BRIDGE SCHOOL
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## OUR COMMITMENT

At Riverside Bridge School, every policy reflects our commitment to creating a safe, inclusive and ambitious school community in which every pupil is valued, every voice matters and every family is respected and supported.

Our policies translate our values into consistent practice. They support high expectations, clear responsibilities, effective partnership and informed decision-making, ensuring that the needs, rights, wellbeing and future outcomes of our pupils remain at the heart of our work.

We work collaboratively, act with integrity and continually reflect upon and improve our practice to achieve the best possible outcomes for every pupil.

## POLICY PRINCIPLES

Our Policy Principles underpin how we work together and guide the decisions and actions we take to support every pupil and their families.




## POLICY PURPOSE & FRAMEWORK

Riverside Bridge School policies set out the expectations, responsibilities and approaches that support safe, consistent and high-quality practice across the school. They translate our values, statutory responsibilities and professional expectations into clear guidance for everyday decision-making and practice.

Each policy forms part of the Riverside Bridge School Policy Framework and should be read alongside any related policies, procedures, statutory guidance and school frameworks referenced within the document.

Policies apply to the members of the school community identified within each document, including staff, governors, parents and carers, volunteers, contractors and other professionals where relevant. Everyone is expected to understand and apply the requirements appropriate to their role and to seek further guidance where clarification is required.

## CURRICULUM DRIVERS




Our Drivers provide a shared golden thread across curriculum, school life, policy and leadership, helping ensure that our decisions and practice remain focused on the experiences and futures we want for every pupil.

# STATEMENT OF INTENT

This policy sets out Riverside Bridge School's approach to recognising, managing and responding to Subject Access Requests (SARs). It establishes how the school will enable individuals to exercise their right of access to personal information while protecting confidentiality, safeguarding information and the rights and freedoms of others.

Riverside Bridge School is committed to openness, transparency and accountability in the way personal information is processed. Individuals have the right to know whether the school is processing their personal information and, where applicable, to receive a copy of that information together with the supplementary information required by data protection law.

As part of Partnership Learning, Riverside Bridge School manages Subject Access Requests in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, relevant amendments made by the Data (Use and Access) Act 2025 and the Trust's data-protection arrangements. Requests will be considered individually and responded to without undue delay and within the applicable statutory timescale.

As a specialist SEND school, Riverside Bridge School recognises that individuals may communicate or exercise their rights in different ways. Reasonable adjustments and appropriate communication support will be provided where required, and decisions concerning requests made by or on behalf of pupils will take account of the individual pupil's understanding, communication and circumstances rather than age alone.

**Our responsibilities to individuals**

Riverside Bridge School will ensure that Subject Access Requests are recognised promptly, recorded appropriately and handled securely. We will take reasonable steps to verify identity or authority where necessary, undertake reasonable and proportionate searches for relevant personal information, protect information relating to other people and seek advice from the Trust Data Protection Officer where appropriate.

We will provide information securely and in a clear and accessible form, explain decisions where information cannot lawfully be provided and maintain appropriate records demonstrating how requests have been managed.

Through these commitments, Riverside Bridge School aims to ensure that individuals can exercise their right of access confidently, fairly and transparently. We will continue to protect personal information while ensuring that Subject Access Requests are managed consistently, securely and in accordance with data protection law.

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**APPROVED BY:** Governing Board

**APPROVED ON:** September 2026

**REVIEWED DUE ON:** September 2027

Section 01

# PURPOSE AND SCOPE

Defining rights. Establishing scope. Supporting consistent practice.

The purpose of this policy is to establish a consistent framework for recognising, managing and responding to Subject Access Requests made under UK data protection legislation.

The policy aims to ensure that Riverside Bridge School:

- complies with its legal obligations;
- protects the rights of individuals;
- responds within statutory timescales;
- manages requests consistently and fairly;
- safeguards confidential information relating to third parties;
- supports openness and accountability.

Operational procedures for responding to Subject Access Requests are maintained separately from this policy to allow administrative processes and template documentation to be updated without requiring amendments to the policy itself.

This policy applies to all Subject Access Requests relating to personal information processed by Riverside Bridge School. It applies to requests made by or on behalf of pupils, parents and carers, employees, governors, volunteers, applicants, contractors, former pupils, former employees and any other individual whose personal information is processed by the school.

Requests may relate to information held in any format, including:

- electronic records;
- emails;
- paper records;
- CCTV recordings;
- photographs;
- audio or video recordings;
- any other records containing personal information.

This policy applies to all members of staff who may receive or assist in responding to a Subject Access Request.

Section 02

# ROLES AND RESPONSIBILITIES

Clarifying accountability. Coordinating requests. Protecting information.

Responding to Subject Access Requests is a shared responsibility across Riverside Bridge School.

**The Governing Board** will:

- ensure appropriate arrangements are in place to enable individuals to exercise their data protection rights;
- receive assurance that Subject Access Requests are managed lawfully and within statutory timescales;
- support compliance with UK GDPR and the Data Protection Act 2018;
- monitor the effectiveness of the school's information governance arrangements.

**The Headteacher** is responsible for ensuring that:

- this policy is implemented effectively;
- sufficient resources are available to respond to requests;
- staff understand their responsibilities;
- appropriate records are maintained;
- advice is sought from the Trust Data Protection Officer where required.

**The School Data Protection Lead** will:

- coordinate all Subject Access Requests received by the school;
- acknowledge requests promptly;
- verify the identity of requesters where appropriate;
- coordinate searches for relevant information;
- liaise with the Trust Data Protection Officer;
- maintain records of requests received and responses issued;
- oversee the application of any exemptions;
- ensure responses are issued within statutory timescales wherever possible.

**The Trust Data Protection Officer (DPO)** will:

- provide advice on complex or sensitive requests;
- advise where exemptions may apply;
- support decisions involving third-party information;

- provide legal and procedural guidance where necessary;
- support the school in complying with data protection legislation.

**All members of staff** must:

- recognise when a Subject Access Request has been made;
- forward requests immediately to the School Data Protection Lead;
- preserve any records relevant to the request;
- assist with searches where requested;
- maintain confidentiality throughout the process.

Section 03

# RECOGNISING A SUBJECT ACCESS REQUEST

Recognising requests. Responding promptly. Removing unnecessary barriers.

A Subject Access Request (SAR) is any request made by an individual asking to access the personal information that Riverside Bridge School holds about them.

A request does not need to:

- mention "Subject Access Request";
- refer to UK GDPR;
- be made using a specific form;
- be made in writing.

Requests may be received:

- by email;
- by letter;
- through an online enquiry;
- verbally;
- via another member of staff;
- through an authorised representative.

Any member of staff receiving a request which may be a Subject Access Request must forward it immediately to the School Data Protection Lead.

Where a request is made verbally, the school may ask the individual to confirm their request in writing to ensure it is fully understood. However, verbal requests will still be recognised as valid Subject Access Requests. This reflects the Trust procedure, which recognises written, email and verbal requests while encouraging written confirmation where appropriate.

The school recognises that some individuals, including those with communication needs or disabilities, may be unable to make a written request. Where appropriate, staff will provide reasonable adjustments to support individuals in exercising their rights under data protection legislation.

Section 04

# RESPONDING TO SUBJECT ACCESS REQUESTS

Managing requests. Meeting timescales. Providing information securely.

The school will respond to Subject Access Requests without undue delay and within the statutory timescale.

Subject Access Requests will normally be responded to within one calendar month of receipt. Where the school reasonably requires information to confirm the requester's identity or, where applicable, their authority to act on behalf of another person, the applicable timescale will be calculated in accordance with data protection legislation and current regulatory guidance.

Where the school holds a large amount of information about an individual or the request is unclear, it may ask the requester to clarify the information they are seeking where clarification is reasonably required to respond effectively. The school will not require an individual to narrow a valid request. Where clarification is sought, the statutory timescale will be managed in accordance with current data protection requirements.

The school will undertake a reasonable and proportionate search for personal information falling within the scope of the request. Relevant staff must cooperate promptly with searches and preserve information that may be relevant to the request.

Where a request is complex, or the individual has made a number of requests, the response period may be extended by up to a further two months, where permitted by law. The requester will be informed of any extension, together with the reasons for it, within the initial one-month period.

Information will be provided securely and in a concise, transparent, intelligible and easily accessible form, using clear and plain language. Where appropriate, reasonable adjustments will be made to support the requester's communication or accessibility needs.

Operational search arrangements, correspondence templates, redaction processes and response documentation are maintained separately from this policy.

Section 05

# VERIFYING IDENTITY

Confirming identity. Acting proportionately. Preventing inappropriate disclosure.

Before disclosing personal information, Riverside Bridge School must be satisfied that the information is being provided to the person entitled to receive it.

The school will not routinely require formal identification where the requester's identity is already known or can reasonably be established through existing information or secure systems. Where there are reasonable doubts about identity, the school may request additional information necessary to confirm it.

Any identity verification will be reasonable and proportionate to the nature and sensitivity of the information requested. The school will not collect more identification information than is necessary for this purpose.

Where a request is made on behalf of another individual, the school will also take reasonable steps to establish the requester's authority to act on that person's behalf.

Where additional information is required to establish identity or authority, it will be requested without undue delay. The statutory response period will be calculated in accordance with applicable data protection requirements.

Where there is uncertainty about identity, authority or the appropriate level of verification, advice will be sought from the Trust Data Protection Officer before information is disclosed.

Section 06

# RESPONDING TO REQUESTS INVOLVING PUPILS

Respecting pupil rights. Considering understanding. Protecting individual interests.

Riverside Bridge School recognises that the right of access to personal information belongs to the individual, including children.
When a Subject Access Request relates to a pupil, the school will consider whether the pupil has sufficient maturity and understanding to exercise their own rights under data protection legislation.

In reaching a decision, the school will consider:

- the age and maturity of the pupil;
- the pupil's ability to understand the nature of the request;
- the pupil's capacity to understand the implications of disclosure;
- any safeguarding or welfare considerations.

As a specialist SEND school, Riverside Bridge School recognises that a pupil's communication needs, cognitive development and decision-making capacity may vary significantly and should not be determined by age alone. Decisions will always be made on an individual basis, taking account of each pupil's needs and, where appropriate, advice from professionals involved in supporting the pupil.

Where a pupil is competent to exercise their own right of access, a parent or carer does not automatically have a right to make a Subject Access Request for that pupil's personal information solely because they hold parental responsibility. The school will consider whether the pupil has authorised the request or whether the person making the request is otherwise entitled to act on the pupil's behalf.

Where the pupil is not able to exercise the right independently, the school will consider whether a person with parental responsibility may appropriately exercise the right on their behalf, taking account of the pupil's individual circumstances and interests. Advice will be sought from the Trust Data Protection Officer where there is uncertainty.

A parent's statutory right to access their child's educational record is separate from the pupil's right of access under data protection legislation. Where a request may fall under education-record legislation rather than, or in addition to, the UK GDPR, the school will identify and apply the appropriate legal framework and timescale.

Section 07

# INFORMATION THAT MAY BE WITHHELD OR REQUESTS REFUSED

Protecting others. Applying exemptions. Making lawful decisions.

Whilst Riverside Bridge School is committed to openness and transparency, there are circumstances in which information may lawfully be withheld or redacted when responding to a Subject Access Request. Examples include where disclosure would:

- identify another individual who has not consented to disclosure;
- prejudice the rights and freedoms of another person;
- compromise safeguarding arrangements;
- interfere with the prevention or detection of crime;
- prejudice legal proceedings;
- reveal information protected by legal professional privilege;
- fall within another exemption provided by data protection legislation.

Where information relating to another individual can reasonably be removed, the school will normally provide a redacted copy of the information.
Where information is withheld, the school will explain the reasons wherever it is lawful and appropriate to do so.

Any decision to withhold information will be made carefully and, where appropriate, in consultation with the Trust Data Protection Officer. This reflects the exemptions and redaction principles within the Trust procedure.

In limited circumstances, the school may refuse to act on a request, or may charge a reasonable fee, where permitted by law, where a request is manifestly unfounded or excessive. Any such decision will be based on the individual circumstances of the request and will not be made solely because a request is extensive, inconvenient or requires a significant search.

Where the school refuses to act on all or part of a request, the requester will be informed of the decision and the reasons for it, together with information about their right to complain through the appropriate process and to the Information Commissioner's Office. Advice will be sought from the Trust Data Protection Officer before a request is refused or a fee is charged.

Section 08

# MONITORING AND REVIEW

Monitoring compliance. Maintaining oversight. Strengthening practice.

The Headteacher has overall responsibility for ensuring that this policy is implemented effectively.

The School Business Leader, acting as the School Data Protection Lead, will:

- maintain a confidential register of Subject Access Requests;
- monitor compliance with statutory timescales;
- identify trends and recurring issues;
- ensure appropriate records are maintained;
- provide advice and support to staff;
- liaise with the Trust Data Protection Officer where necessary;
- review operational procedures regularly.

The Governing Board will receive assurance that:

- Subject Access Requests are managed appropriately;
- statutory responsibilities are being met;
- appropriate procedures remain in place;
- the school continues to comply with data protection legislation.

This policy will be reviewed annually, or sooner, where legislation, statutory guidance or Trust procedures change.

The accompanying Subject Access Request Procedure and associated template documents will be reviewed regularly and may be updated independently of this policy.

Section 09

# RELATED POLICIES & FRAMEWORKS

Connecting practice. Strengthening consistency.

This policy should be read alongside:

- Data Protection (GDPR) Policy
- Data Breach Response Policy
- Data Retention Policy
- Information Security Policy
- Privacy Notices
- CCTV Policy
- Freedom of Information Policy
- Complaints Policy
- Subject Access Request Policy

# APPENDIX


RIVERSIDE BRIDGE SCHOOL
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Subject Access Request Process
How we manage requests for personal information
Everyone has the right to know what personal information we hold about them.
Here is how we handle Subject Access Requests at Riverside Bridge School.
1. REQUEST RECEIVED
We receive your request
You can make a request by email, letter, verbally or through someone acting on your behalf.
Forward to us
All requests are passed to our School Data Protection Lead straight away.
We acknowledge your request
We will acknowledge your request promptly and let you know what happens next.
2. WE REVIEW YOUR REQUEST
Check your identity
We may ask for ID or other information to confirm who you are.
Find your information
We search for the personal information we hold about you across our systems and records.
Review and protect
We review the information. We may remove details about other people or information that we cannot share.
3. OUR RESPONSE TO YOU
We respond on time
We will normally respond within 1 calendar month. If we need more time (up to 2 more months) we will let you know why.
Information provided
We will provide your information in a clear, readable format.
Any questions?
If you are unhappy with our response, we will explain your right to complain to the ICO.
Remember
We take your request seriously
We keep your information safe
We respect your rights
We are here to help
Inspiring communication, empowering independence, achieving brighter futures.
Inclusion
Partnership
Safety
Achievement
Communication
Care