



SUBJECT ACCESS REQUEST PROCEDURE AND OTHER INDIVIDUAL RIGHTS

Policy Version:	V1
Colleagues affected by this Policy:	All staff
Person responsible for the Policy:	Chief Operating Officer
Approved by/ date:	September 2026
Next review:	Sept 2028 or until advised by DPO
Source	HY Education

Introduction

1. This is the SARs and Other Individual Rights Procedure (“Procedure”) of The Sea View Trust (“the Trust” / “we” / “us”).
2. The Trust recognises that SARs and other individual rights involve important legal obligations and may give rise to risks relating to confidentiality, safeguarding, third-party disclosures, records management and wider information governance obligations if not managed appropriately. This Procedure has therefore been implemented to ensure that such individual rights requests are identified, recorded, managed and responded to in a consistent and compliant manner.
3. This Procedure establishes the framework which must be followed whenever the Trust receives a request from an individual seeking to exercise their rights under UK GDPR. The different types of requests that may be made are set out later in this Procedure.
4. This Procedure applies to all staff, schools, departments, contractors and other individuals acting on behalf of the Trust where they receive, manage or respond to requests.
6. This Procedure does not form part of any employee’s contract of employment and may be amended at any time.
7. The Procedure will be reviewed and updated in accordance with documented review dates, though the Trust reserves the right to update this Procedure at any time where it is more immediately necessary to do so, for example because of operational changes, court or regulatory decisions, or changes in regulatory guidance.

Individual Rights

8. Individuals may exercise a number of rights in relation to their personal information under UK GDPR. These rights include:
 - 8.1 the right of access;
 - 8.2 the right to rectification;
 - 8.3 the right to erasure;
 - 8.4 the right to restriction of processing;
 - 8.5 the right to object to processing; and
 - 8.6 other applicable rights provided under UK GDPR.

9. For the purposes of this Procedure, these requests are collectively referred to as “Individual Rights Requests”.

Receipt of Request

10. Where a school or department receives an Individual Rights Request, it must notify the Trust’s central team without delay.
11. The school or department must provide:
- 11.1 the requester’s details;
 - 11.2 the date the request was received;
 - 11.3 copies of correspondence or communications received; and
 - 11.4 any other relevant information relating to the request.
12. Schools and departments must not respond directly to the requester unless authorised to do so.

Creation of Request in DPOwl

13. The Trust’s central team is responsible for creating and managing requests within the Subject Access Request Register in DPOwl.
14. Upon receipt of the request, the central team must:
- 14.1 access DPOwl;
 - 14.2 navigate to the Subject Access Request Register;
 - 14.3 select “Add SAR”; and
 - 14.4 complete the required governance stages.
15. The process consists of the following stages:

Step 1 – Requestor Details

16. The central team must record the details of the person submitting the request.

Step 2 – Request Details

17. The central team must record:
- 17.1 where applicable, the school that received the request;
 - 17.2 the requester’s name;
 - 17.3 the date that the request was received;

- 17.4 the request type;
- 17.5 where applicable, that identification has been verified;
- 17.6 the applicable response timeframe;
- 17.7 whether an extension may apply; and
- 17.8 any relevant notes.

Step 3 – DPO Advice

- 18. The central team must indicate within DPOwl whether DPO advice or support is required.
- 19. DPO assistance may also be requested to provide support with review and redaction of disclosure materials.

Step 4 – Review and Submit

- 20. Before submission, the central team must review the information entered in DPOwl to ensure that it is accurate and complete.
- 21. Once submitted:
 - 21.1 the request will be recorded within the Subject Access Request Register; and
 - 21.2 the applicable response timeframe will be monitored within DPOwl.

Step 5 – DPO Review

- 22. Where DPO support has been requested, the DPO will provide advice in relation to any of the following matters:
 - 22.1 scope of the request;
 - 22.2 disclosure considerations;
 - 22.3 third-party information;
 - 22.4 exemptions;
 - 22.5 extensions of time; and
 - 22.6 refusal considerations.

Step 6 - Response Preparation and Issue

- 23. Before a response is issued, the DPO and/or Central Team must review the information gathered and the appropriate person depending on the size or complexity of the request, complete any required redactions (unless the DPO has been commissioned to undertake redactions).

24. Responses must be issued in accordance with UK GDPR, including by electronic means where applicable unless otherwise requested.

Other matters

Identity Verification

25. Where required, the Trust may request additional information to verify the identity of the requester.
26. Where a request is made on behalf of another individual, evidence of authority to act on behalf of the data subject may be requested.
27. Where identity verification is required, the response timeframe may be paused until sufficient information has been provided.

Searches and Information Gathering

28. Relevant schools, departments and staff may be instructed to undertake searches for information falling within the scope of the request.
29. Staff must provide requested information and cooperate with search and review exercises within required timescales.
30. Information identified during searches must be returned through the approved governance process and must not be disclosed directly to the requester.

Closure and Record Keeping

31. Once the request has been completed, the central team must:
- 31.1 record the outcome of the request;
 - 31.2 confirm the response date;
 - 31.3 retain relevant correspondence and supporting documentation; and
 - 31.4 close the request within DPOwl.

Changes To This Procedure

32. The Trust will keep this Procedure under regular review and may amend it from time to time to reflect operational, legal or regulatory changes.