



# The First Federation Trust

## Subject Access Request procedure

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If you are reading a printed version of this document, you should check the Trust website / FFT team policies channel to ensure that you have the most up-to-date version.

If you have any questions, please contact:

Data Protection Officer: **Data Protection Education Ltd.**

Telephone: 0800 0862018

Email: [dpo@dataprotection.education](mailto:dpo@dataprotection.education)

If you would like a copy of any documentation, please contact the school office, or the Trust office: [admin@firstfederation.org.uk](mailto:admin@firstfederation.org.uk)

# Subject Access Request Procedure

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## Introduction

### Scope

This procedure applies to all personal data processed by the First Federation Trust (including its schools), excluding personal data that is asked for as a matter of routine by data subjects.

Data subjects are entitled to exercise their right of access under the UK GDPR. If a request is valid, they must be provided with the requested personal data in an easy-to-access format, free of charge, within one calendar month\* of the request.

\*See 'Deadlines' below for variances to this.

### Who

This procedure is applicable for all staff and managers:

- All staff are responsible for handling any information request received in line with UK GDPR requirements by following this procedure; and
- All staff have a responsibility to recognise a request for information and ensure it is passed to the responsible member of staff and/or the Data Protection Officer within two working days.

## What is the purpose of the right of access under UK GDPR?

The UK GDPR gives the reason for allowing individuals to access their personal data as so that they are aware of and can verify the lawfulness of the data processing (Recital 63).

## Definitions

- **Personal data** means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is a person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or by one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- **Data subject rights** – this refers to the rights that the UK GDPR gives to data subjects in relation to their personal or sensitive data including:
  - The right to be informed about what data is processed/shared, how and why;
  - The right of access (i.e. subject access requests);
  - The right to rectification, correcting errors;
  - The right to erasure (i.e. the right to be forgotten);
  - The right to restrict processing;
  - The right to data portability;

- The right to object;
- Rights in relation to automated decision making and profiling using personal data.
- **Subject access request (SAR)** – a request made by a data subject for information about, and access to, their personal data about themselves that The Organisation is processing, including:
  - a description of the personal data;
  - where/how it is being processed;
  - the purposes for which it is being processed;
  - details of who is allowed to see the personal data;
  - how long it will be kept.

## How to recognise a valid Subject Access Request (SAR)

There is no formal way to submit a request. Valid SARs can be submitted in writing (e.g., letter, fax, email, website form, texts, Facebook, or Twitter) or verbally.

They include all requests for personal data, whether or not the data subject has referred to data protection, SARs, or the Data Protection Act and include requests which refer to Freedom of Information instead. It is up to you to recognise the request and deal with it as helpfully as possible.

Verbal requests are considered valid, but good practice suggests staff members receiving such requests, should record the details of the request and confirm the details with the requester in order to avoid later disputes. (We recommend that the request is documented on the SAR form in the appendix.)

## Who can receive a SAR?

A SAR can be given to any staff member, contracted, permanent or otherwise.

## Deadlines

Schools must deal with all reasonable requests within one calendar month, starting on the day the request is received. Variances to this may include:

- If an identity (ID) check or consent is required to comply with the request, then the deadline will be calculated from the date when the new information is received.
- If you need to clarify the request, the 'clock is stopped' whilst you seek clarification
- If the request is deemed complex, the data subject should be informed of the decision, and the deadline may be extended by up to two months.

The data subject must also be informed as soon as possible if school holidays could impact the school's ability to carry out ID checks and/or meet the one calendar month deadline.

## The SAR procedure:

The objective of the procedure is to make sure that the request is properly received, and Data Protection Education can handle communications with the requestor and process any redactions.

Within the First Federation Trust, the school data protection leads are the head of school and the school administrator (senior school administrator in larger schools), as set out in the poster in the staff room(s).

# Subject Access Request Procedure

## Subject Access Request Procedure

The DPO is Data Protection Education (dpo@dataprotection.education)

**Your DP school lead is:**

**Email:**

## RESPONDING TO A SUBJECT ACCESS REQUEST



*Copies of redacted documents should be held:  
(details of folder location in school with appropriate security)*

**Also review the document: Recognising a Subject Access Request**

# Subject Access Request Procedure

## SUBJECT ACCESS REQUEST (FORM) – PART 1

By completing this form, you are making a subject access request under the General Data Protection Regulation (UK GDPR) for personal information held about you by The First Federation Trust/relevant school that you are eligible to receive. Please complete this form and return it to The First Federation Trust/relevant school.

### A) The Data Subject Details

|                                                                                                                                                                                                                                                                   |  |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| Title                                                                                                                                                                                                                                                             |  |
| Surname                                                                                                                                                                                                                                                           |  |
| First Name(s)                                                                                                                                                                                                                                                     |  |
| Current Address                                                                                                                                                                                                                                                   |  |
| Telephone (Home)                                                                                                                                                                                                                                                  |  |
| Telephone (Work)                                                                                                                                                                                                                                                  |  |
| Telephone (Mobile)                                                                                                                                                                                                                                                |  |
| Email address                                                                                                                                                                                                                                                     |  |
| Date of birth                                                                                                                                                                                                                                                     |  |
| Details of identification provided to confirm the name of the data subject in question                                                                                                                                                                            |  |
| Details of the information requested:<br><i>[Insert details of the information you want that will help us to locate the specific information. Please be as precise as possible, for example, Emails between "A" and "B" from 1 May 2017 to 6 September 2017.]</i> |  |

### B) Declaration of Data Subject

By signing below, you indicate that you are the individual named above. The organisation cannot accept requests regarding your personal data from anyone else, including family members – see Part 2. We may need to contact you for further identifying information before responding to your request. You warrant that you are the individual named and will fully indemnify us for all losses and expenses if you are not.

Signature: .....

Date: .....

## SUBJECT ACCESS REQUEST (FORM) – PART 2

### C) Declaration of behalf of Data Subject

*If you are requesting the information on behalf of a data subject, please complete this section:*

|                                                                                                          |     |    |
|----------------------------------------------------------------------------------------------------------|-----|----|
| Are you acting on behalf of the data subject with their written consent or in another legal authority?   | Yes | No |
| If 'Yes' please state your relationship with the data subject (e.g. parent, legal guardian or solicitor) |     |    |
| Has proof been provided to confirm you are legally authorised to obtain the information?                 | Yes | No |

|                     |  |
|---------------------|--|
| Title               |  |
| Surname/Family Name |  |
| First Name(s)       |  |
| Current Address     |  |
| Telephone (Home)    |  |
| Telephone (Work)    |  |
| Telephone (Mobile)  |  |
| Email address       |  |

I hereby request that the First Federation Trust/relevant school provide me with the information about the data subject above.

Name .....

Signature: .....

Date: .....