



Policy: Subject Access Request

Policy reference no: 018

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Person responsible for policy: Stephen Dean, Chief Executive Officer

Authorised by: Board of Trustees

Review date: December 2027

This Policy applies to all schools within the Primary QuEST Multi-Academy Trust. Primary QuEST is a Church of England Trust which seeks to ensure all pupils flourish, together in a supportive and caring environment.

Flourishing Together Through LIFE

Statement

Enabling individuals to find out what information Primary QuEST Multi-Academy Trust (the 'Trust') holds about them, why we hold it and who we disclose it to is fundamental to good information handling practice. The Data Protection Act 1998 gives individuals the right to request access to such information. The General Data Protection Regulation (GDPR), which came into effect on 25th May 2018, strengthened individuals' rights, including those covered under Subject Access Requests.

The Trust is committed to protecting individuals through ensuring robust procedures are in place to ensure that the data of individuals are not compromised. Internal management and control procedures and policies are monitored by senior management. This policy and procedures document outlines the rights of individuals¹ to request access to personal data that the Trust may hold about them.

Personal Data

Personal data are defined within GDPR as 'any information relating to an identifiable person who can be directly or indirectly identified'. In other words, any data we hold that could allow another individual to identify that person. This would include, but is not necessarily limited to:-

- Name, Address
- Date of Birth
- Telephone Number, Email Address
- Unique Pupil Number
- National Insurance Number
- Passport Number

The personal data that the Trust holds is set out within the Trust's Privacy Notices which are available from the schools.

The Right of Access

Under GDPR individuals have the right to obtain:

- confirmation that their data is being processed;
- access to their personal data; and
- other supplementary information

Requests for such information (subject access requests) must be made following the procedure outlined in the Procedures section of this policy.

Subject Access Requests Procedures

In the event that a parent or carer (on behalf of a child or themselves) or staff member wishes to pursue their right to obtain information that the Trust holds about them, they are required to follow the procedures below. The Trust shall also adhere to the internal procedures detailed.

Making a Subject Access Request

Any individual wishing to access information about the data we hold are required to make such request in writing. Where possible, we ask that the Subject Access Request form is completed and sent to the Trust by post or email, for the attention of the head teacher. The Trust shall not accept verbal requests.

Verifying Identity of Individual

In order to continue its commitment to protecting individuals, staff at the Trust shall, on receipt of a request, contact the individual that has requested the information, by telephone in order to verify the identity and authenticity of the request. The staff member will ask two security questions.

Timescale

Upon receipt of the subject access request the Trust shall contact the individual for verification purposes within 3 working days. The information shall be supplied to the individual within one month from the date of receipt of the request. The Trust reserves the right to extend this period by a further two months, upon consultation with the individual, where the request is complex or excessive.

Fees

The GDPR states that organisations (including schools and Multi Academy Trusts) shall not charge a fee for provision of access unless the request is manifestly unfounded or excessive, particularly because they are repetitive. In accordance with this the Trust shall not charge a fee where the request is reasonable but reserves the right in other cases to charge a *reasonable fee*, calculated on the time required to fulfil the requirements of the request. In this event the individual will be informed of the cost within one month of the date that the request was received.

Refusal to respond

The Trust has the right to refuse to respond to a request that is *manifestly unfounded or excessive*. In the event that the Trust refuses to respond it will inform the individual, without undue delay and within one month, of the reason for the refusal.

How the information is issued

Information may be supplied electronically or in paper format. An analysis will be made to determine which of the formats is the most appropriate and the decision will be agreed between the person making the request and the school. In the event that the information is supplied electronically it will be provided in PDF format.

Whilst the GDPR recommends good practice to be access to a self-service portal this is not

currently available at the Trust. Subject Access Requests will, at all times, be managed by a member of the administrative team.

Biblical Underpinning for Church of England schools

At the beginning of Matthew and Luke's Gospel there is data collection. Matthew (chapter 1) gives readily available data about the ancestry of Abraham to David to Jesus. This information links Jesus to his family. Luke (chapter 2) recalls the census of Emperor Augustus. This data is misused – the holy family is threatened. The school in its GDPR policy is wise to the difference.

This Policy is reviewed by the General Purpose Audit and Finance Committee every 2 years and must be approved by the Trust Board.