Updated: February 2026

Cornerstone Academy Trust

Subject Access Request Policy

Cornerstone Academy Trust - Policy Statement

Subject Access Request Policy

The UK GDPR and Data Protection Act 2018 (henceforth referred to as 'UK data protection legislation') give individuals the right of access to their personal information held by The Cornerstone Academy Trust (TCAT).

This policy explains how TCAT will fulfil its legal obligations, taking account of all applicable legislation and guidance, including: UK General Data Protection Regulation – Article 15 – Right of access by the data subject.

Data Protection Act 2018 – Section 45 – Right of access by the data subject
Data Use & Access Act 2025 – Sections 75-79 – Data Subject's Rights
ICO Subject Access Code of Practice

Individuals have several rights under UK data protection legislation. In summary, individuals have the right to:

- Be kept informed about how the Trust uses, shares, and stores their personal data. We do this by providing individuals with a Privacy Notice which can be found on our website.
- Request access to their personal data held by *insert school name*. This is called a Data Subject Rights Request (DSAR) or Subject Access Request (SAR). Such requests will, throughout the course of this Policy, be referred to as 'SARs'.
- Have inaccurate or incomplete information about them corrected.
- Ask for their data to be deleted when it's no longer needed.
- Restrict the use of their data in certain circumstances.
- Transfer their data to another organisation in certain circumstances.
- Object to the use of their data in certain circumstances eg, direct marketing.
- Prevent automated decisions being made about them (including profiling).
- Raise a concern with *insert school name* about the handling of their personal data and if they remain dissatisfied with the response, to escalate this to the Information Commissioner's Office (ICO).

This policy outlines how an individual can make a request for their personal information and how it will be processed by the school.

This is not a legal document. It does not confer rights nor override any legal or statutory provisions which either require or prevent disclosure of personal information.

All defined terms in this policy are indicated in bold text, and a list of definitions is included in the Annex 1 to this policy.

1 Recognising a SAR

1.1 As TCAT processes personal data concerning data subjects, those data subjects have the right to access that personal data under UK Data Protection Legislation. A request to access this personal data is known as a subject access request or SAR.

1.2 A data subject is generally only entitled to access their own personal data, and not information relating to other people. However, data relating to a child may be released

to an individual who holds parental responsibility for that child. Provided that the release of such data is considered to be in the child's best interests.

1.3 Any request by a data subject for access to their personal data is a SAR. This includes requests received in writing, by email, and verbally.

1.4 If any member of our staff receives a request for information, they should inform the Data Protection Liaison Officer ("DPLO") as soon as possible. Our DPLO is Kyriaki Constanti, and she can be contacted by email at: DPO@tcat.education

1.5 In order that TCAT is properly able to understand the nature of any SAR and to verify the identity of the requester, any requester making a request verbally should be asked to put their request in writing and direct this to the DPLO. This can only be requested and not a condition of processing the request.

1.6 A SAR will be considered and responded to in accordance with UK Data Protection Legislation.

1.7 Any SAR must be notified to the DPLO at the earliest opportunity.

2 Verifying the Identity of a Requester and Entitlement to the Data

2.1 TCAT is entitled to request additional information from a requester to verify whether the requester is in fact who they say they are.

2.2 Where TCAT has reasonable doubts as to the identity of the individual making the request, evidence of identity may be established by production of two or more of the following:

- Current passport
- Current driving licence
- Recent utility bills with current address
- Birth/marriage certificate
- Recent credit card or mortgage statement
- Proof of parental responsibility, such as, birth certificate or court order

2.3 If TCAT is not satisfied as to the identity of the requester or their entitlement to the data then the request will not be complied with, to avoid the potential for an inadvertent disclosure of personal data resulting in a data breach.

3 Fee for Responding to Requests

3.1 TCAT will usually deal with a SAR free of charge

3.2 Where a request is manifestly unfounded or excessive, a fee may be requested. Alternatively, TCAT may refuse to respond to the request. If a request is considered to be manifestly unfounded or unreasonable the TCAT will inform the requester, why this is considered to be the case.

4 Time Period for Responding to a SAR

SARs must be responded to within one calendar month from the date of receipt of a valid request. This deadline can be extended by up to a further two calendar months, in certain circumstances, for requests considered 'complex'. However, it may not be possible to comply with these deadlines outside of school term dates due to school closure. In these circumstances, the school must keep the individual regularly informed of progress with their request and communicate an anticipated response time-line in order to ensure transparency and to enable requestors to manage their expectations.

5 Sharing Information with Third Parties

5.1 Data subjects can ask that members of TCAT share their personal data with another person such as an appointed representative (in such cases you should request written authorisation signed by the data subject confirming which of their personal data they would like you to share with the other person).

5.2 Equally if a request is made by a person seeking the personal data of a data subject, and which purports to be made on behalf of that data subject, then a response must not be provided unless and until written authorisation has been provided by the data subject. TCAT should not approach the data subject directly but should inform the requester that it cannot respond without the written authorisation of the data subject.

5.3 If TCAT is in any doubt or has any concerns as to providing the personal data of the data subject to the third party, then it should provide the information requested directly to the data subject. It is then a matter for the data subject to decide whether to share this information with any third party.

5.4 Personal data belongs to the data subject, and in the case of the personal data of a child regardless of their age the rights in relation to that personal data are theirs and not those of their parents. Parents, in most cases, do not have automatic rights to the personal data of their child.

5.5 However, there are circumstances where a parent can request the personal data of their child without requiring the consent of the child. This will depend on the maturity of the child and whether TCAT is confident that the child can understand their rights. If they are deemed not to be sufficiently mature as to understand their rights of access a parent can request access to their personal data on their behalf.

5.6 Where the child is considered to have capacity, TCAT will require the written authorisation of the child before responding to the requester or provide the personal data directly to the child in accordance with the process above.

5.7 A data subject may ask a third party (eg a relative, friend or solicitor) to make a SAR on their behalf. Before responding, you need to be satisfied that the third party making the request is entitled to act on behalf of the individual. It is the third party's responsibility to provide evidence of their authority.

5.8 In all cases TCAT should consider the circumstances of the case, and the above are guidelines only.

6 Withholding Information

6.1 There are circumstances where information can be withheld pursuant to a SAR. These are specific exemptions and requests should be considered on a case-by-case basis.

6.2 Where the information sought contains the personal data of third-party data subjects then TCAT will:

- Consider whether it is possible to redact information so that this does not identify those third parties, considering that it may be possible to identify third parties from remaining information.
- If this is not possible, consider whether the consent of those third parties can be obtained; and
- If consent has been refused, or it is not considered appropriate to seek that consent, then to consider whether it would be reasonable in the circumstances to disclose the information relating to those third parties. If it is not, then the information may be withheld.

6.3 So far as possible TCAT will inform the requester of the reasons why any information has been withheld. We do not have to release information in the following instances:

- If the information contains personal data about another person and we do not have their consent to release that information, or it is unreasonable to disclose it without their consent.
- Disclosure is likely to cause someone serious harm to their mental or physical health or wellbeing.
- Disclosure would prejudice crime prevention, detection, prosecution of an offender.
- The information contains confidential communications between us and our legal advisers.
- If it's for a reference which has been provided in confidence.
- It's for education data given to a court as part of court proceedings.
- Another law prohibits disclosure.
- It contains management forecasting or management planning and disclosure at that time could prejudice the effective running of our school.

6.4 Disclosure is likely to prejudice negotiations with the individual.

7 Process for Dealing with a SAR

7.1 When a SAR is received, TCAT and its schools will:

- notify the DPLO and school leaders with a Subject Access Request Form, filled out by the person(s) requested the Subject Access Request. The Subject Access Form is located on the Cornerstone Academy Trust website under 'Data Protection'. The DPLO will be responsible for managing the response with the relevant school leaders.
- take all reasonable and proportionate steps to identify and disclose the data relating to the request.
- never delete information relating to a subject access request, unless it would have been deleted in the ordinary course of events – it is an offence to amend or delete data following receipt of a SAR that would not have otherwise been so amended or deleted.

- consider whether to seek consent from any third parties which might be identifiable from the data being disclosed.
- seek legal advice, where necessary, to determine whether TCAT is required to comply with the request or supply the information sought.
- ensure that information disclosed is clear and technical terms are clarified and explained.

7.2 **Refusal**

The Trust can refuse any request if:

- Manifestly Unfounded or excessive – The Trust can refuse to comply with any any request considered to be manifestly unfounded or excessive, including confirming or denying whether we hold the information. The Trust will consider the context and history of a request, including the identity of the requester and previous contact with them. If the Trust decides to refuse for this reason, we will notify the requester and keep a record of the reasons for the decision.

8 Providing the Completed Response

8.1 Once any queries around the information requested have been resolved and any necessary redactions or exemptions have been made, the information will be checked by another member of staff ensuring that it meets the scope of the request. A copy of the disclosure will be saved, and the relevant record closed on the information request log. Where documents have been redacted, the unredacted version will also be held in the event that a subsequent request is made by the individual. This is to provide staff with ease of access should there be any documents which are later disputed.

8.2 We will explain any complex terms or abbreviations contained within the information when it is shared.

8.3 The response will be made in the format requested by the individual. This will usually mean they will be given a physical copy, or the information will be emailed. Any information sent by email will be securely sent using Egress unless the individual asks that the information is sent to them using unencrypted email. In this event, the individual will be advised that this method of transfer is not recommended as security of the information cannot be guaranteed. If the individual insists that the information is sent unencrypted, we will follow their request and ask that this is confirmed in writing by them before it is sent.

8.4 If the individual requests a physical copy, this can be sent either by:

- Hand delivery or
- Collected in person or
- Posted using Special Delivery

9 Complaints

If the individual is unsatisfied with our response to their request, they should write to the person who initially responded to their request outlining the reason/s for their dissatisfaction, contact the DPLO direct on DPO@tcat.education or complete our Data Protection Complaints Form, available on our website or directly via the link below:

Form - Data Protection Complaints Form - The Cornerstone Academy Trust

Should the individual remain dissatisfied, they can escalate this to the Information Commissioner's Office:
Email: icocasework@ico.org.uk

LINKS WITH OTHER POLICIES

This policy should be read in conjunction with the following:

- Data Protection Policy
- Freedom of information Policy
- Records Retention Policy

The ICO also provides a free helpdesk that can be used by anyone and a website containing a large range of resources and guidance for members of the public. See Information Commissioner's Office (ICO)

Appendix 1 - Definitions

Term	Definition
Data	is information, which is stored electronically, on a computer, or in certain paper-based filing systems;
Data Subjects	for the purpose of this policy include all living individuals about whom we hold personal data. This includes pupils, our workforce, staff, and other individuals. A data subject need not be a UK national or resident. All data subjects have legal rights in relation to their personal information;
Personal Data	means any information relating to an identified or identifiable natural person (a data subject); an identifiable natural person is one 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 to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
Data Controllers	are the people who or organisations which determine the purposes for which, and the manner in which, any personal data is processed. They are responsible for establishing practices and policies in line with Data Protection Legislation. We are the data controller of all personal data used in our business for our own commercial purposes;
Data Users	are those of our workforce (including Trustees and volunteers) whose work involves processing personal data. Data users must protect the data they handle in accordance with this data protection policy and any applicable data security procedures at all times;
Data Processors	include any person or organisation that is not a data user that processes personal data on our behalf and on our instructions;
Processing	is any activity that involves use of the data. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction. Processing also includes transferring personal data to third parties;
Special Category Personal Data	includes information about a person's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health or condition or sexual life, or genetic or biometric data; and
Staff	Includes, any individual employed by the Trust such as staff and those who volunteer in any capacity including Trustees/Members/parent helpers.

Updates to this Notice

Reviewed by (job role):	Date:	Next Review Date:
Full Trust Board	September 2023	September 2024

DPO / DPLO	February 2026	February 2028