Omnia LEARNING TRUST

Subject Access Request Policy

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Policy Review Schedule

Policy	OLT Subject Access Request Policy
Review schedule	Annually (or when there is a change in legislation)
Statutory Policy	No
Policy owner	CEO
Lead Reviewer	DCS (external review if change in legislation)
Approver and date of last approval	CEO, 03/11/2026
Key review dates	**Changes made**
January 2015	Written
January 2016	None
January 2017	None
January 2018	In response to changes in the GDPR and Subject Access Request
January 2020	Updated details of DPO and contact information

April 2020	Split from FOI charging policy Removed request to receive SARs in writing Added requirement to keep a log of SARS and reasons for refusing SARS on GDPRIS Merged SAR checklist form for staff with this policy
April 2021	Changes: Added reference to UK GDPR legislation Replaced GDPR with UK GDPR
April 2022	Form added to confirm SAR collected by requestor
April 2023	No changes made. Policy cross referenced with ICO guidance to ensure compliance
April 2024	No changes made
April 2025	Minor updates for clarity on alignment with current ICO guidance to include time limits for responding and complaints process. The SAR Request Forms at the end of the Policy have been relabelled for clarity and updated in line with ICO guidance to include requesting a data subject's relationship to the school/Trust, and clarity on requests for ID.
September 2025	Updated wording in the complaints section (per the DUAA 2025) to clarify the assistance available to complainants.
October 2026	Updated with external HR advice to comply with current legislation/statutory guidance
Next review date: October 2027	

Subject Access Requests for data

Under the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and the Data (Use and Access) Act 2025, individuals, referred to here as Data Subjects, are permitted to request personal information held by the Trust about them. These requests for information are referred to as Subject Access Requests.

Subjects wishing to access their data may use the Subject Access Request Form at the end of this Policy, but they are not required to do so. Requests may be made directly to each school office, Principal or any part of the Trust, and may be made verbally or in writing. A school (or the Trust) must ensure that any subject access request is recognised, recorded and, where appropriate, the Subject Access Request Form (Requestor) at the end of this Policy is used to capture relevant information about each subject access request.

Subject Access Requests ('SARs') differ from Freedom of Information Requests. In brief, article 15 of the UK GDPR gives a data subject the right to obtain:

- Confirmation that their data is being processed.
- Access to their personal data.
- Other supplementary information.

The supplementary information includes, for example, information about the source and recipients of the data, details of international transfers, other data subject rights, the right to lodge a complaint with the Information Commissioner's Office (ICO) and the envisaged retention period for the data.

Where a SAR relates to a child, the Trust will consider whether the child has sufficient understanding to make their own request. A parent, carer or other representative will not automatically be given access, and the Trust may require evidence of parental responsibility or other authority, taking account of the child's rights and best interests.

Fees for Subject Access Requests

Subject access requests are normally free of charge. A reasonable fee may be charged for further copies of the same information requested by data subjects and/or where a request is manifestly unfounded or excessive, taking account of whether it is repetitive. The fee is based on the administrative cost of providing the information.

Time limit for Subject Access Requests

Under the UK GDPR the requested information from a data subject must be provided without delay and at the latest within one month of receipt of the SAR (or within one month of receipt of information requested to confirm the requester's identity or receipt of a fee where requested in certain circumstances). The time to respond can be extended by a further two months where the request is complex or where there are numerous requests. If this is the case, the data subject/requester will be contacted within one month of the receipt of the request to explain why the extension is necessary.

All refusals will be issued in writing, setting out the reasons and the right of the data subject to complain to the ICO and to seek a judicial remedy.

Format of responses

Where the data subject makes a SAR by electronic means, and unless otherwise requested by the data subject, the information will be provided in a commonly used electronic format. Before providing the information, the data controller will verify the identity of the person making the request using 'reasonable means'.

Access and data portability

In response to a SAR, a data subject will receive a copy of their personal data and the related supplementary information. A request for data in a structured, commonly used and machine-readable format, or for transmission to another data controller, will be considered separately where the right to data portability applies.

Unlike the subject access right, the data portability right does not apply to all personal data held by the data controller concerning the data subject.

First, it has to be automated data. Paper files are not included.

Second, the personal data must be data provided by the data subject, which may include data they have actively provided and certain data observed from their use of the service.

Third, the personal data has to be processed by the data controller with the data subject's consent or pursuant to a contract with them.

In contrast, the subject access right applies to personal data about a data subject processed by the data controller, regardless of the format it is held in, the justification for processing or its origin, subject to any applicable exemptions and any necessary redactions to protect the rights and freedoms of others.

It is important to note that both rights do not require data controllers to keep personal data for longer than specified in their retention schedules or privacy policies. Nor is there a requirement to start storing data just to comply with a request if received.

Complaints
If the applicant does not agree with the proposed fee or has a complaint about an aspect of the process, they may make a data protection complaint to the Trust in writing, verbally or electronically (as set out in the OLT Data Protection Policy), and can contact the school office if they need help to do so. The Trust will acknowledge receipt within 30 days, investigate the complaint, keep the complainant informed without undue delay and communicate the outcome without undue delay. The applicant may also complain directly to the Information Commissioner's Office at any time.

Subject Access Request Form (Data Subject)

1. **Data Subject Details**

Title (Mr, Mrs, Miss, etc)	
Surname	
First name	
Relationship with the school or Trust	Please Select: *Pupil / parent / carer / employee / governor or Board director / volunteer OR* *Other (please specify):*
Current address	
Telephone number	
Email address	
Details of data requested	*Please provide details of the information you want that will help us to locate the specific information, being as precise as possible:*

1.1 Acting on behalf of a Data Subject

Are you acting on behalf of the data subject with their written or other legal authority?	
If yes, please state your relationship with the data subject (parent, legal guardian or solicitor)	
Please enclose proof of written authority or legal status for acting on behalf of data subject and confirm document title here:	
Title	
Surname	
First name	
Current address	
Telephone number	
Email address	

DECLARATION

I, _____ the undersigned and the person identified in (1) above, request that the Omnia Learning Trust provide me with data about me. I understand that Omnia Learning Trust may request receipt of one or more formal identification documents* to verify my identity before processing my data request.

Signature: **Date:**

Name of person completing this form:

OR

I, _____ the undersigned and the person identified in (1.1) above, request the Omnia Learning Trust provide me with data about the person identified in (1) above. I understand that Omnia Learning Trust may request receipt of one or more formal identification documents* to verify my identity before processing my data request.

Signature: **Date:**

*Examples of identification documents that may be requested, where reasonably necessary to confirm identity, include: passport, driving licence, birth certificate, utility bill (last 3 months), vehicle registration document, bank statement (last 3 months), rent book. If identity is already known to the Trust, further evidence will not usually be required beyond a verification of any written request, typically by way of phone call, to ensure that the request has been made by the person known to the Trust.

Subject Access Request Form (Requestor) - to be completed by requestor when collecting the data held

Name of School or Trust	
SAR Requester's name	
SAR Requester's address	
Date Subject Access Request was made	
If ID documents were requested, confirm which ones, the date they were verified and the name of the person in the organisation who verified these:	
Date SAR collected (by requestor)	
Signature of requestor (to confirm SAR has been collected from the school or Trust)	