



Telford Court

Subject Access Request Policy and Procedure

2026-2027

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1. Policy Statement

The Greenhouse HyFlex Academy is committed to upholding individuals' rights under UK GDPR, including the right of access to personal data held about them. This policy sets out how The Greenhouse will handle Subject Access Requests (SARs) in a timely, transparent and lawful manner.

2. Legal Framework

This policy complies with:

- UK GDPR — Article 15 (Right of Access)
- Data Protection Act 2018
- The Data Use and Access Act 2025
- ICO Guidance on Subject Access Requests
- Keeping Children Safe in Education 2026

3. What is a Subject Access Request?

A Subject Access Request (SAR) is a written request made by an individual (or someone acting on their behalf) to access the personal data The Greenhouse holds about them.

Anyone whose personal data is processed by The Greenhouse has the right to make a SAR. This includes:

- Learners (and their parents/carers, where the learner lacks capacity or is under 13)
- Staff (current and former)
- Parents and carers
- Other individuals whose data we hold

4. How to Make a SAR

Requests can be made:

- In writing by email to the Headteacher or Data Protection Lead
- In writing by post to The Greenhouse's registered address
- Verbally (the Greenhouse may ask for written confirmation)

The Greenhouse may ask for reasonable evidence of identity to verify the requester before releasing data.

5. Timescales

The Greenhouse will respond to a SAR within one calendar month of receipt. Where a request is complex or numerous, this may be extended by a further two months, with notification to the requester within the first month.

6. What Will Be Provided

In response to a valid SAR, The Greenhouse will provide:

- Confirmation of whether personal data about the individual is held
- A copy of the personal data held
- Information about the purposes for which it is processed
- Categories of data held
- Recipients or categories of recipient
- Retention periods
- Details of the individual's rights

7. Exemptions

Certain information may be withheld if an exemption applies under the Data Protection Act 2018 or UK GDPR. Exemptions may apply to:

- Information that would identify third parties (unless they consent to disclosure)
- Information subject to legal professional privilege
- Information relating to crime prevention or detection
- Information that could prejudice the physical or mental health of the requester

The Headteacher will seek legal advice before relying on any exemption.

8. Requests on Behalf of Others

Where a request is made on behalf of another person (e.g. a parent on behalf of a child), The Greenhouse will verify:

- That the requester is entitled to act on behalf of the individual
- Whether the individual themselves consents to the disclosure

For looked-after children or those with an EHCP, particular care will be taken to consider the child's best interests and any safeguarding implications before releasing data.

9. Fees

SARs will be handled free of charge. However, The Greenhouse may charge a reasonable fee if a request is manifestly unfounded or excessive, particularly if it is repetitive.

10. Record Keeping

All SARs will be logged and tracked by the Headteacher. Records will include the date of receipt, the nature of the request, actions taken and the date of response.

11. Monitoring and Review

This policy will be reviewed annually by the Headteacher and approved by the Business Director.

12. Related Policies

This policy must be read in conjunction with the following related policies:

- UK GDPR Policy and Procedure
- Breach Notification Policy and Procedure
- Archiving, Disposal and Storage of Records Policy

This policy has been written by Fiona Conde (Headteacher) and approved by Jonathon Simpson (Business Director).

Jonathon Simpson

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