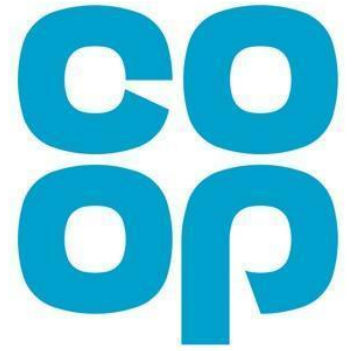


Academies Trust

8th Floor, Angel Square,  
Manchester, M60 0AG



# Data Subject Request Policy

Approved by the Trust Board on 20 October 2022  
Applicable from 21 October 2022

Appendix 2 of Data Protection Policy

## 1 Purpose

The Co-operative Academies Trust, including all of its academies, is required to follow the Data Protection Act (2018) and the UK Data Protection Regulation (UK GDPR) in the way that it collects and uses personal data.

Chapter 3 of the UK GDPR sets out the rights of data subjects with respect to their personal data. Although the most common right is Subject Access, there are many others. As a group these are referred to as "data subject requests". The regulations set out the steps that data controllers need to put in place to allow data subjects to exercise these rights.

This policy sets out the approach that the Trust will take to deal with data subject requests.

The Trust has a directly employed Data Protection Officer, who can be contacted via [data@coopacademies.co.uk](mailto:data@coopacademies.co.uk).

## 2 Introduction

The UK GDPR describes the responsibilities that organisations have when dealing with personal data. Personal data is defined as any information relating to an identified or identifiable natural person. The person is known as a 'data subject'.

The UK GDPR provides data subjects with rights in respect of their personal data. Not all rights apply in respect of all personal data. Data subjects have the following rights:

- Right of access by the data subject
- Right of rectification
- Right of erasure ('right to be forgotten')
- Right of restriction of processing
- Right of data portability
- Right to object to processing
- Right not to be subject to automated individual decision making, including profiling

The nature of the personal data and the reason for its use determine which of these rights are applicable. Guidance about whether a particular right is applicable should be sought from the Data Protection Officer.

When a data subject seeks to exercise one of these rights it is called a data subject request. The most common data subject request is a subject access request (SAR)

As the Trust deals with young people, there are certain circumstances where a parent or another legal representative may exercise these rights on behalf of the young person. Any situations where there is a question over rights to access

personal data or the exercising of these other rights must be referred to the Data Protection Officer.

### 3 Related policies

This policy is closely linked with other policies which should be referenced when appropriate, including:

- Data Protection Policy
- Child protection
- Safeguarding
- Any other relevant guidance documents

### 4 Responsibilities

4.1 The Trust will:

- 4.1.1 Put in place a clear procedure for dealing with data subject requests. This is detailed in the Trust's Data Protection Handbook which is made available to all Academy Data Protection Ambassadors;
- 4.1.2 Follow any additional guidance from the Information Commissioner's Office (ICO) produced subsequently to this policy;
- 4.1.3 Inform the Data Protection Officer of all data subject requests;
- 4.1.4 Record the details of data subject requests and make those records available to the Data Protection Officer;
- 4.1.5 Ensure that data subject requests are dealt with in line with the statutory time limits and notify the Data Protection Officer as soon as possible if these limits can't be met;
- 4.1.6 Ensure that proper account is taken of the risk of disclosing information about a third party in responding to a data subject request and the risk of failing to maintain the availability and integrity of the personal data it processes;
- 4.1.7 Take advice from the Data Protection Officer with regards to the management of data subject requests.

4.2 The Data Protection Officer will:

- 4.2.1 Provide guidance and support to the Trust in dealing with a data subject requests;
- 4.2.2 Ensure that all subject access requests are redacted where appropriate using software designed for this purpose, such as Adobe Pro, and that all redactions have been checked by a second person before being released;

- 4.2.3 Provide a route of communication to the Information Commissioner's Office in the event of issues with the content or timing of responses to a data subject request.

## 5 Implementation of policy

This Policy shall be deemed effective on 21 October 2022. No part of this Policy shall have retroactive effect and shall thus apply only to matters occurring on or after this date.

## 6 Review

This policy on data subject requests will be reviewed bi-annually, or when the Information Commissioner's Office (ICO) issues revised guidance on this topic.