



ST MARY'S SCHOOL
HAMPSTEAD

Subject Access Requests

Independent Day School for Girls

St Mary's School, Hampstead

September 2023

1 Introduction

Individuals have a right to make a Subject Access Request (SAR) to gain access to personal information that the School holds about them.

This includes:

- what personal information the School holds about them;
- how the School is using it;
- who the School is sharing it with; and
- where the School got their data from.

2 Procedure

Subject Access Requests may be made verbally or in writing; however, so we have clarity over the request, we would prefer them to be submitted in writing, either by letter or email to the Headmistress or Bursar. Requests sent by email can be sent to the dedicated email address: DataProtection@stmh.co.uk.

They should include:

- name of individual;
- correspondence address;
- contact number and email address where appropriate; and
- details of the information requested.

3 Children and Subject Access Requests

Personal data about a child belongs to that child, and not the child's parents or carers. For a parent or carer to make a Subject Access Request with respect to their child, the child must either be unable to understand their rights and the implications of a Subject Access Request, or have given their consent. Children aged 12 and above are generally regarded to be mature enough to understand their rights and the implications of a Subject Access Request.

As the children at our School are usually all under 12, most Subject Access Requests from parents or carers of pupils at our School may be granted without the express permission of the pupil. This is not a rule and a pupil's ability to understand their rights will always be judged on a case-by-case basis.

4 Responding to Subject Access Requests

When responding to requests, we:

- may ask the individual to provide two forms of identification;
- may contact the individual via phone to confirm the request was made;
- will respond without delay and within 1 month of receipt of the request;
- will provide the information free of charge;
- may tell the individual we will comply within 3 months of receipt of the request, where a request is complex or numerous. We will inform the individual of this within 1 month, and explain why the extension is necessary.

We will not disclose information if it:

- might cause serious harm to the physical or mental health of the pupil or another individual;
- would reveal that the child is at risk of abuse, where the disclosure of that information would not be in the child's best interests;
- is contained in adoption or parental order records;
- is given to a court in proceedings concerning the child.

If the request is unfounded or excessive, we may refuse to act on it, or charge a reasonable fee which considers administrative costs.

A request will be deemed to be unfounded or excessive if it is repetitive, or asks for further copies of the same information.

When we refuse a request, we will tell the individual why, and tell them they have the right to complain to the ICO.