Lighthouse MAT
Subject Access Request

Policy Owner:	Lighthouse Multi Academy Trust Data Protection Officer (DPO)
Approved/ Ratified:	Pat Hunt 10.11.26
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Document Version Control Log

Version	Modification Date	Synopsis of Changes
1.0	September 2025	
2.0	October 2026	Policy rewritten and aligned with UK GDPR, DPA 2018, the Data (Use and Access) Act 2025 and ICO right of access guidance (Dec 2025). Added the SAR proforma as the single recording route, an internal SAR record, a handling procedure with timescales, exemptions, safeguarding review, a complaints procedure and template letters. Removed outdated Data Protection Act 1998 references.

1. Purpose and Scope

Everyone has the right to find out whether Lighthouse Multi Academy Trust ("the Trust") holds personal data about them, and to receive a copy of it. This is called the **right of access**, and a request to use it is a **Subject Access Request (SAR)**.

This policy explains how to make a SAR and how the Trust and its academies will respond. It applies to every academy in the Trust, to the Trust Central Team, and to all trustees, governors, staff, volunteers and contractors who handle personal data on the Trust's behalf.

The Trust is the **data controller** for all of its academies. This means SARs are made to the Trust, even when they are received by an academy, and the Trust is legally responsible for the response.

2. Legal Framework and Guidance

This policy follows the law and guidance below, and the advice of the Trust's Data Protection Officer (DPO).

- **UK General Data Protection Regulation (UK GDPR)**, in particular Article 12 (how requests are handled) and Article 15 (the right of access).
- **Data Protection Act 2018 (DPA 2018)**, in particular Schedules 2, 3 and 4, which set out exemptions, and section 170 (unlawfully obtaining personal data).
- **Data (Use and Access) Act 2025**, which confirms that the Trust must carry out a **reasonable and proportionate search**, allows the response time to be **paused while the Trust waits for information it needs** ("stop the clock"), and, from 19 June 2026, requires the Trust to have a **data protection complaints procedure**.
- **Information Commissioner's Office (ICO) guidance on the right of access**, updated in December 2025 to reflect the Data (Use and Access) Act 2025.
- **Keeping Children Safe in Education 2026** and the Trust's Safeguarding and Child Protection Policy, which must be considered before any safeguarding information is disclosed.

The Education (Pupil Information) (England) Regulations 2005, which give parents a separate right to see their child's educational record, do not apply to academies. Parents who ask for their child's records are treated as making a SAR on behalf of their child (see section 6).

3. Definitions

Term	Meaning
Personal data	Any information relating to an identified or identifiable living person. This includes names, contact details, pupil records, emails, notes, photographs and CCTV images.
Data subject	The person the personal data is about.
Requester	The person making the SAR. This may be the data subject, or someone acting on their behalf, such as a parent or solicitor.
Data controller	Lighthouse Multi Academy Trust, which decides how and why personal data is used across all its academies.
Data Protection Officer (DPO)	The person who advises the Trust on data protection, oversees SAR responses and is the contact point for the ICO.
Academy SAR Lead	The member of staff in each academy (normally the School Business Manager or Office Manager) who coordinates SARs for that academy.
SAR Proforma	The Trust's Subject Access Request Form in Appendix 1.
SAR Log	The central register of all SARs kept by the Trust.

4. How to Make a Request

4.1 The SAR Proforma

The Trust asks everyone making a SAR to use the SAR Proforma in Appendix 1. The proforma is available on every academy's website and from every academy office. It asks for the details we need to find the right information quickly, confirm identity and send the response securely. The SAR Proforma is an optional administrative aid and must not be used as a condition of making a valid request.

Completed proformas should be emailed, posted or handed to the academy office and addressed to Data Protection Officer.

Lighthouse Multi Academy Trust uses Walsall Council's Schools Data Protection Officer (DPO) Traded Service to support the Trust's academies and Central Team with data protection and UK GDPR compliance, including advice and guidance on Subject Access Requests (SARs).

The Trust remains responsible for meeting its legal obligations as data controller. The DPO provides independent advice and oversight in accordance with the agreed service arrangements.

The Trust's designated DPO contact is **Paul Withers**. Requests and correspondence should be directed to the DPO through the contact details published in this policy. Emailed to info@lhmat.com or handed directly to academy office or trust office.

4.2 Requests made in other ways

UK GDPR does not allow the Trust to refuse or delay a request because it was not made on the proforma. A SAR is valid if it is made verbally or in writing, by letter, email, telephone, in person or through social media, and it can be made to any member of staff. The requester does not have to use the words "subject access" or mention the law.

To keep one consistent process, **every request will be recorded on the SAR Proforma**. Where a request is made in another way, the member of staff who receives it will:

- complete the SAR Proforma on the requester's behalf, using the information they have given;
- send a copy to the requester and ask them to check it, add anything missing and return it; and
- pass the request to the Academy SAR Lead and the DPO on the same working day.

The response time starts from the date the **original request** was received, not the date the proforma is returned. If the Trust genuinely needs more information to identify the requester or to understand what they are asking for, the time limit is paused until it is received (see section 8).

4.3 What staff must do when they receive a request

- Treat any request from a person to see information held about them, or about a child they are responsible for, as a possible SAR.
- Record the date and time the request was received.
- Forward it, with any proforma, to the Academy SAR Lead and the DPO **on the same working day**. Do not try to answer it yourself.
- Do not delete, amend or move any information once a request has been made. Deleting information to avoid disclosing it is a criminal offence under section 173 of the DPA 2018.

5. Who Can Make a Request

Requester	What is needed
The data subject (pupil, parent, member of staff, governor, trustee, volunteer, former pupil or former staff member)	The SAR Proforma and, where needed, proof of identity.

Requester	What is needed
A parent or carer requesting their child's data	Evidence of parental responsibility where this is not already held by the academy. The child's competence must be considered (section 6).
A solicitor, advocate or other third party	Written authority signed by the data subject, as well as the proforma. The Trust may contact the data subject directly to confirm they agree.
A person with a lasting power of attorney or court order	A copy of the power of attorney or court order.

6. Requests About Children

Personal data relating to a child is the child's personal data. A parent or person with parental responsibility does not automatically have the right to access all personal data held about a child.

When a parent, carer or other representative makes a SAR on behalf of a child, the Trust must consider whether the child has sufficient understanding and maturity to exercise their right of access independently and whether the requester is authorised to act on the child's behalf.

- **Children under 12** are generally not considered mature enough, so a parent may usually act on their behalf.
- **Children aged 12 and over** will generally be presumed capable of exercising their own data protection rights unless there is evidence to the contrary. Each case will be assessed individually. The academy will normally ask for the child's written consent before releasing their data to a parent, using section 7 of the proforma.
- These ages are a guide, not a rule. The child's understanding, any SEND and the circumstances must always be considered. A competent child can also make a SAR themselves.
- Even when a parent is entitled to act, information will be withheld if releasing it would not be in the child's best interests or would put the child or another person at risk (section 11).
- Where there is a court order restricting a parent's access to information, the academy must follow it. The academy will check its records for any order before responding.

7. Proof of Identity

The Trust must be sure it is releasing information to the right person. Proof of identity will only be asked for where it is reasonable and proportionate.

- If the requester is well known to the academy (for example, a current parent or member of staff making the request from a known email address), further ID is not normally needed.
- Otherwise, the Trust will ask for one photographic document (such as a passport or driving licence) and one document showing the current address (such as a utility or council tax bill dated within the last three months).
- ID can be checked in person at the academy office instead of sending copies. Copies will be deleted once identity has been confirmed.
- The Trust will ask for ID as soon as possible, and within five working days of receiving the request.

8. Time Limits

Situation	Time limit
Standard request	**One calendar month**, starting the day after the request is received. For example, a request received on 3 September must be answered by 3 October. If there is no matching date (for example, 31 January), the deadline is the last day of the next month.

Situation	Time limit
Proof of identity needed	The month starts from the day after the ID is received.
Clarification needed ("stop the clock")	Where the Trust holds a large amount of information about the person and genuinely needs them to clarify what they want, the time limit is paused from the date clarification is requested until the date it is received. This must not be used to delay requests. The Trust will only seek clarification where it cannot reasonably identify the information requested. Where possible, searches and review work will continue while clarification is being sought.
Complex or numerous requests	The deadline can be extended by up to **two further calendar months**. The requester must be told within the first month of the extension and the reasons.
School holidays	School holidays do **not** pause the time limit. Each academy must have cover arrangements in place so SARs received just before or during holidays are dealt with on time.

Missing the deadline is a breach of UK GDPR and can be reported to the ICO. Any risk of missing a deadline must be raised with the DPO immediately.

9. Fees

SARs are **free of charge**. The Trust may charge a reasonable fee, based on the administrative cost, only where a request is manifestly unfounded or excessive, or where the requester asks for further copies of information already provided. The DPO must approve any fee, and the requester will be told before any work is done.

10. Handling Procedure

The Academy SAR Lead coordinates the response, with the DPO overseeing every request. Each step is recorded on the Internal SAR Record (Appendix 2).

Step	Action	Who	When
1. Receive and log	Record the request on the SAR Proforma and the SAR Log. Calculate the deadline. Open an Internal SAR Record.	Member of staff receiving it; Academy SAR Lead	Same working day
2. Acknowledge	Write to the requester confirming receipt, the deadline, and any ID or clarification needed (Appendix 3, letter A).	Academy SAR Lead	Within 5 working days
3. Verify and clarify	Check identity, parental responsibility, the child's competence and any third-party authority. Record any pause to the time limit.	Academy SAR Lead; DPO	As soon as possible
4. Search	Carry out a reasonable and proportionate search of all relevant systems (section 10.1) and record what was searched and why.	Academy SAR Lead with relevant staff	Within 10 working days of step 3
5. Collate	Gather copies of all information found into a single secure folder. Remove duplicates.	Academy SAR Lead	Within 15 working days
6. Review and redact	Review each page. Redact third-party data and apply any exemptions (section 11). Any safeguarding records must be reviewed by the DSL.	Academy SAR Lead; DSL; DPO	Within 20 working days

Step	Action	Who	When
7. Quality check	The DPO checks the redactions, exemptions and covering letter, and signs off the response.	DPO	At least 3 working days before the deadline
8. Respond	Send the information securely with the covering letter (Appendix 3, letter C), including the supplementary information in section 10.2.	Academy SAR Lead	By the deadline
9. Close	Update the SAR Log and keep the SAR file in line with the Trust's retention schedule.	Academy SAR Lead; DPO	Within 5 working days of responding

10.1 Reasonable and proportionate search

The Trust must make reasonable efforts to find all the personal data requested. It does not have to carry out searches that would be unreasonable or disproportionate to the importance of the information to the requester, but it must be able to explain why any system or source was not searched. The search will normally include:

- management information system (for example, Arbor or SIMS) and assessment records;
- CPOMS or other safeguarding and behaviour records;
- email accounts and Microsoft 365 or Google Workspace files (including Teams and shared drives) of staff likely to hold relevant information;
- SEND, medical, attendance and admissions records;
- HR, payroll and recruitment files (for staff requests);
- paper files, including files kept in classrooms and offices;
- CCTV, where specifically requested and still retained;
- work messaging apps and staff work devices, where these are used for Trust business.

Staff asked to search must do so promptly and confirm in writing what they searched and what they found.

Any decision not to search a particular system, account or repository must be documented in the Internal SAR Record together with the reasons for that decision.

10.2 What the response must include

As well as a copy of the personal data, the response must tell the requester:

- why the Trust uses their data, and the types of data held;
- who the data has been or will be shared with;
- how long the data will be kept, or how this is decided;
- where the data came from, if not from the data subject;
- their rights to ask for data to be corrected or deleted, to restrict or object to its use, and to complain to the Trust and to the ICO;
- whether any automated decision-making is used (the Trust does not normally use it); and
- whether any information has been withheld, and the reason, unless explaining this would itself cause harm.

10.3 Format and secure delivery

Information will be provided in the format the requester asked for where reasonable. Where the request was made electronically, information will be provided electronically unless the requester asks otherwise. Information will be sent by encrypted email or secure file transfer, with the password sent separately, by recorded delivery, or for collection in person with ID. Original documents must never be sent.

11. Withholding Information (Exemptions)

Some information may be withheld or redacted. Exemptions must be applied case by case, the reasons must be recorded, and the DPO must agree them. The most common in schools are:

Exemption	When it applies
Third-party information (DPA 2018 Sch 2, para 16)	Information about another person, unless they agree or it is reasonable to disclose without their agreement. Names of staff acting in their professional role will often be disclosed, but each case must be considered.
Serious harm (DPA 2018 Sch 3, Parts 2–4: health, social work and education data)	Where disclosure would be likely to cause serious harm to the physical or mental health of the data subject or another person. The DSL must be consulted, and children's social care where relevant.
Child abuse data (DPA 2018 Sch 3, para 21)	Where a parent requests a child's data and disclosure of information about abuse or risk of abuse would not be in the child's best interests.
Legal professional privilege (DPA 2018 Sch 2, para 19)	Confidential communications with the Trust's lawyers.
Crime and taxation (DPA 2018 Sch 2, para 2)	Where disclosure would be likely to prejudice the prevention or detection of crime, for example a live police investigation.
Confidential references (DPA 2018 Sch 2, para 24)	References given by the Trust in confidence for employment, education or training.
Exam scripts and marks (DPA 2018 Sch 2, paras 25–26)	Answers written by candidates in exams are exempt. Requests for exam marks made before results are published have an extended time limit.
Management information and negotiations (DPA 2018 Sch 2, paras 22–23)	Management forecasts or plans, and records of the Trust's intentions in negotiations, where disclosure would prejudice them.

Redaction must be permanent, using redaction software or black-out on a copy that is then rescanned. Covering text with a coloured box in a word processor is not acceptable.

12. Safeguarding

No record from CPOMS or any safeguarding file may be released without review by the academy's Designated Safeguarding Lead (DSL). The DSL will consider whether disclosure could put a child or another person at risk, and whether to consult children's social care or the police before anything is released. Where information is withheld for safeguarding reasons, the requester may not always be told why, if telling them would itself cause harm.

13. Manifestly Unfounded or Excessive Requests

The Trust may refuse a request, or charge a reasonable fee, where it is manifestly unfounded (for example, made only to cause disruption, with no real intention of exercising the right of access) or manifestly excessive (for example, clearly unreasonable when compared with the benefit to the requester). This will be rare, and the DPO must make the decision. The requester must be told within one month, with the reasons and their right to complain to the ICO or go to court.

14. Specific Types of Request

- **Staff requests**, including during a grievance, disciplinary or employment tribunal, follow this policy. The HR lead will support the search with the DPO. A SAR does not pause any HR process.
- **CCTV footage** will be provided as stills or redacted footage, blurring other people unless it is reasonable to disclose them.
- **Requests from the police or other agencies** are not SARs and are handled under the Trust's data sharing procedures.

- **Requests for information that is not personal data** (for example, Trust policies or spending) are handled under the Freedom of Information Act 2000.

15. Complaints

The Trust will maintain a data protection complaints procedure in accordance with section 164A of the Data Protection Act 2018, as amended by the Data (Use and Access) Act 2025.

This procedure applies to complaints about the Trust's handling of personal data and compliance with data protection legislation, including complaints about the handling of a SAR.

Individuals may submit a complaint in writing, by email or verbally to the Trust's designated data protection contact. The Trust will provide accessible means of making a complaint and reasonable assistance where required.

The Trust will:

- Acknowledge receipt of the complaint within **5 working days**.
- Investigate the complaint promptly and without undue delay, making appropriate enquiries to establish the facts and address the issues raised.
- Aim to complete the investigation and communicate the outcome, including any action taken, within 30 calendar days of receipt of the complaint.
- Where the investigation cannot reasonably be **completed within 30 calendar days**, inform the complainant of the reasons for the delay, provide an expected completion date and keep them updated on progress until the complaint is resolved.
- Record the investigation, findings, outcome and any actions taken.

Complaints will be handled by an appropriately appointed person, with DPO advice where required and appropriate arrangements for impartial consideration.

If the complainant remains dissatisfied, they may complain to the Information Commissioner's Office (ICO) at https://ico.org.uk/make-a-complaint/ or by telephone on 0303 123 1113.

This procedure does not replace other Trust complaints procedures where a complaint also concerns employment, safeguarding, education or another matter outside the scope of data protection legislation.

16. Roles and Responsibilities

Role	Responsibilities
Trust Board	Approves this policy and receives an annual report on SARs, including numbers, timeliness and complaints.
CEO	Ensures the Trust has the resources to respond to SARs on time.
Data Protection Officer (DPO)	Oversees every SAR, keeps the SAR Log, agrees exemptions and fees, signs off responses, handles complaints and liaises with the ICO.
Headteacher	Ensures the academy has a trained Academy SAR Lead and cover arrangements for holidays and absence.
Academy SAR Lead	Coordinates SARs for the academy, completes the Internal SAR Record and meets each step's timescales.
Designated Safeguarding Lead	Reviews all safeguarding records before release and advises on risk.
HR Lead	Supports searches and reviews for staff SARs.
All staff	Recognise SARs, pass them on the same day, search promptly when asked, and never delete or alter information once a request is made.

17. Training, Monitoring and Review

- All staff will be told how to recognise a SAR as part of annual data protection training.
- Academy SAR Leads will receive specific training on searching, redaction and exemptions.
- The DPO will review the SAR Log termly and report to the Trust Board annually.
- This policy will be reviewed annually by the DPO, or sooner if the law or ICO guidance changes.

This policy should be read alongside the Trust's Data Protection Policy, Privacy Notices, Records Retention Schedule, Freedom of Information Policy, Safeguarding and Child Protection Policy and Complaints Policy.

Appendix 1: Subject Access Request Proforma

Lighthouse Multi Academy Trust

Please use this form to ask for a copy of the personal data the Trust or one of its academies holds about you, or about someone you are acting for. Please complete all sections that apply and return it to the Data Protection Officer at the address or email address shown in section 9, or hand it in at any academy office.

We will respond within one calendar month of receiving your request. If we reasonably require proof of identity before releasing information, the response period will begin when that information is received. Where clarification is required to identify the information requested, the response period may be paused until the clarification is provided. Making a request is free of charge.

Section 1: Your details (the person making the request)	
Full name	
Address	
Telephone number	
Email address	
Your relationship with the Trust or academy	☐Pupil ☐Former pupil ☐Parent/carer ☐Member of staff ☐Former member of staff ☐ Governor/trustee ☐Volunteer ☐Solicitor/representative ☐Other: _____

Section 2: Details of the person the information is about (if different from section 1)	
Full name	
Date of birth	
Academy attended or worked at	
Dates attended or employed (if known)	
Your relationship to this person	☐ am their parent/carer with parental responsibility ☐ hold a lasting power of attorney or court order ☐ am acting with their written authority ☐Other: _____

Section 3: The information you are requesting
Please describe the information you want as clearly as you can, including dates, the academy, and the names of any staff or departments involved. This helps us respond more quickly. Continue on a separate sheet if needed.

Please tick any types of information you are particularly interested in (optional):

☐Pupil record (attendance, assessment, reports) ☐SEND records ☐Behaviour records ☐Emails about me

☐Medical or welfare records ☐HR/personnel file ☐CCTV images (please give date, time and location) ☐Everything held about me

Section 4: How you would like to receive the information

☐By secure email (the password will be sent separately) ☐Paper copy by recorded delivery ☐Paper copy to collect in person (ID required)

Section 5: Proof of identity

If you are not already known to the academy, please provide copies of:

☐one photographic document (for example, a passport or driving licence); and

☐one document showing your current address, dated within the last three months (for example, a utility or council tax bill).

If you are acting for someone else, please also provide their proof of identity, and your evidence of authority (such as a signed authority, lasting power of attorney or court order).

Alternatively, you can bring your documents to the academy office to be checked in person. Copies will be securely deleted once your identity has been confirmed.

Section 6: Requests about a child

If you are requesting information about a child aged 12 or over, we will normally need the child's agreement. Please ask the child to complete section 7. If the child is under 12, or you believe they are unable to understand the request, please explain why below.

Section 7: Consent of the person the information is about (if different from section 1)

I agree to the person named in section 1 receiving a copy of my personal data.

Signed: _____ Print name: _____ Date: _____

Section 8: Declaration

☐ confirm that the information I have given on this form is correct, and that I am the person named in section 1 or am entitled to act on behalf of the person named in section 2.

I understand that the Trust may need to contact me to confirm my identity or clarify my request, and that it is a criminal offence under section 170 of the Data Protection Act 2018 to knowingly or recklessly obtain personal data without the consent of the data controller.

Signed: _____ Print name: _____ Date: _____

Section 9: Where to send this form

Data Protection Officer, Lighthouse Multi Academy Trust, Davis Road, Willenhall, WS12 5HA

Email: info@lhmat.com , marked "Subject Access Request"

Or hand it in at any Lighthouse Multi Academy Trust academy office.

How we use your information: we will only use the information on this form to confirm your identity and respond to your request. It will be kept in line with the Trust's retention schedule. See our privacy notice for more details.

Appendix 2: Internal SAR Record (staff use only)

The Academy SAR Lead must complete this record for every request and keep it in the secure SAR folder. A copy is sent to the DPO and logged with the Lighthouse Multi Academy Trust

Request details	
SAR reference number	
Academy	
Date request received	
How received	☐Proforma ☐Letter ☐Email ☐Verbal (proforma completed by staff) ☐Social media ☐Other
Received by (name and role)	
Date passed to Academy SAR Lead and DPO	
Requester and data subject	
Original deadline (one month)	
Acknowledgement sent (date)	

Identity, authority and time limit	
ID requested (date) / received (date)	
Parental responsibility / authority checked	☐Yes ☐Not needed Notes:
Child's competence considered (child aged 12+)	☐Yes ☐Not applicable Consent obtained: ☐Yes ☐No
Court order checked	☐None held ☐Order held – details:
Clarification requested (date) / received (date)	
Days paused	
Extension applied?	☐No ☐Yes – reason and date requester told:
Final deadline	

System searched	**Searched by**	**Date**	**Items found**	**Reason if not searched**
MIS (Arbor/SIMS)				
CPOMS / safeguarding records				

System searched	Searched by	Date	Items found	Reason if not searched
Email and Microsoft 365 / Google files				
SEND and medical records				
HR / payroll files				
Paper files				
CCTV				
Other:				

Review and sign-off	
Exemptions applied and reasons	
DSL review of safeguarding records	☐Not needed ☐Completed – name and date:
Third parties consulted	
DPO sign-off (name and date)	
Date sent and method	
Deadline met?	☐Yes ☐No – reason:
SAR Log updated (date)	

Appendix 3: Template Letters

Letter A: Acknowledgement

Dear [name],

Thank you for your subject access request, which we received on [date]. Your reference number is [reference].

We will respond by [deadline]. [If ID or clarification is needed: Before we can start, please send us [details]. The time limit will start, or restart, when we receive this.]

If you have any questions, please contact [Academy SAR Lead / DPO] at [contact details].

Yours sincerely,

Letter B: Extension notice

Dear [name],

We are writing about your subject access request received on [date] (reference [reference]). Because [reason, for example the volume of information or number of requests], we need to extend the time limit by [one/two] month(s), as allowed by Article 12(3) of UK GDPR. We will now respond by [new deadline].

If you are unhappy with this, you can complain to the Trust's Data Protection Officer at [contact details], or to the Information Commissioner's Office at ico.org.uk.

Yours sincerely,

Letter C: Response cover letter

Dear [name],

Please find enclosed the personal data we hold about [you / name], in response to your request received on [date] (reference [reference]).

We use this information to [purposes]. It has been shared with [recipients] and will be kept for [retention period]. [Where the data came from, if not from you: source.]

[Some information has been withheld or redacted because [exemption, explained simply], unless explaining this would itself cause harm.]

You have the right to ask us to correct or delete your information, to restrict or object to how we use it, and to complain to us or to the Information Commissioner's Office (ico.org.uk, 0303 123 1113).

Yours sincerely,