



Welcome to a Live Webinar on:

Subject Access Requests

Loading...

Currently securing your data

Please answer our poll questions (on the right) while you wait



Subject Access Requests

A.K.A SAR's

Tell me everything!!

About 9ine Consulting

Experts in:

**Data
Protection**

**Cyber
Security**

Technology

Safeguarding

Your Hosts



Judith Downing

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at 9ine Consulting**



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**Senior Consultant - Data Protection
at 9ine Consulting**

Attendees today



A brief history

Data Protection is not new, it can be traced as far back as to the signing of the Magna carta in 1215.

- 1215 - Magna Carta

A brief history

Convention 108 emerged from The Council of Europe to regulate data protection on an international level.

1215 - Magna Carta

1981 - Convention 108

A brief history

- 1215 - Magna Carta
- 1981 - Convention 108
- 1984 Data Protection Act

A brief history

In 1995 the EU harmonized data protection law across Europe with the Data Protection Directive. This became the Data Protection Act 1998 in the UK.

- 1215 - Magna Carta
- 1981 - Convention 108
- 1984 Data Protection Act
- 1998 – Data Protection Act

A brief history

Upheld as the Global benchmark for Data Privacy, the principles are used worldwide as best practice, regardless of jurisdiction. As such, the policies, procedures and data protection services provided by 9ine use the GDPR as the benchmark for ensuring compliance.

- 1215 - Magna Carta
- 1981 - Convention 108
- 1984 Data Protection Act
- 1998 – Data Protection Act
- 2018 – GDPR

A brief history

- 1215 - Magna Carta
- 1981 - Convention 108
- 1984 Data Protection Act
- 1998 – Data Protection Act
- 2018 – GDPR
- 2018 – Data Protection Act (UK)

Some countries have now aligned their own Data Protection law to reflect GDPR.

Is this a SAR?

Two routes, both will need to be identified in your in-house Data Protection processes.

- Can you handle the request as part of your day to day business?
- Does it need to be treated as a SAR?

Definition

All Data subjects, defined as “any **person** whose ***personal data*** is being **collected, held or processed**”.

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- Students - consider their age and maturity. The age of consent in the UK is 13, but can range from 12 - 16 in other countries.
- Parents
- Full/Part time Staff
- Visitors/Contractors

All Data subjects, defined as “any *person* whose **personal data** is being collected, held or processed”.

A(4)(a) ‘personal data’ means any information relating to an identified or identifiable natural person (‘data subject’);

Identifiable Types



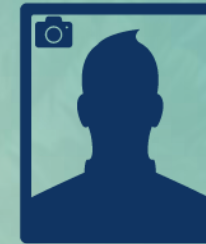
Name



ID number



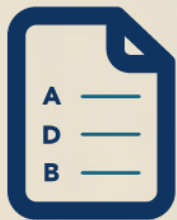
Location Data



Photo



Physical ID



School Reports



School Registers



Medical Report



Safeguarding &
Child Protection
Report



CCTV

SAR's

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It essentially means anything that is done to, or with, personal data (including simply collecting, storing, sharing or deleting that data).



SAR's

When is a good time to receive an SAR?

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NEVER!!!

How will an SAR be received?



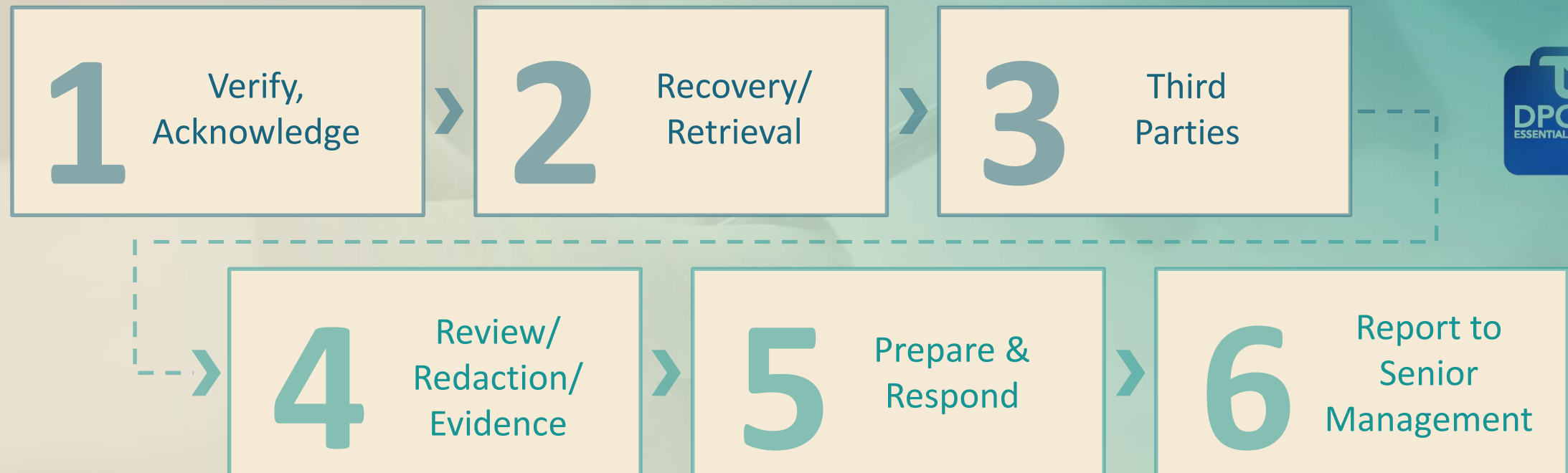
How will an SAR be received?



No restrictions as to how a request for information is made or who can submit a request.

30 Days to Respond

6 Key steps to follow



Case Study 1

- The school has been involved in a disciplinary procedure with a member of staff.
- The member of staff has subsequently been dismissed.
- They have now submitted a subject access request to see all the information relating to their employment at the school.
- They have asked for their personnel file; all email correspondence between the Head Teacher and a specific member of staff.
- They have asked for this to be available within seven days.

Case Study 2

- A parent has asked for all information about their child including educational reports, internal emails about their child, and any emails sent to their now estranged partner.
- They wish to have the information from when their child started school to the present day (4 years).

Case Study 3

- A parent believes that their child was bullied whilst at school.
- They have asked for details of the other child involved and their parents details.
- They have provided the date and time of the alleged incident.

Approaches to Redaction

Talking points:

- No SAR is the same.
- No redaction will be the same.



Redaction is difficult



Email our Service desk to gain assurance.

dposupport@9ine.uk.com

You've been:

☒ Open

☒ Co-operative

☒ Fair

☒ Provided all that you can

☒ Transparent

☒ And left an Auditable Trail

☒ Supportive

All within 30 Days

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All within 30 Days - ***Amazing Job!!***

So what's next?

- The requester can come back for more / dispute released info / complain to the regulator.
- And then you need to consider retention.



For service desk support visit:

dposupport@9ine.uk.com



For support with long term data protection compliance, or short term, information rights and breach management solutions

Data Protection Officer Essentials +



For expert advice on Data Protection, Cyber Security, Technology & Safeguarding

www.9ine.uk.com



A place for our schools to collaborate & interact with each other

9inecommunity.slack.com



Thanks for watching

Please answer our poll questions (on the right) before you leave

www.9ine.uk.com

for expert advice on Data Protection, Cyber Security, Technology & Safeguarding