



Mission Statement

A caring Christian family where we grow together

RIGHT OF ACCESS DURING SCHOOL HOLIDAYS PROCEDURE

Effective Date: 16/03/2020

Review Date: Oct 2024 annual

Review Date	Signed Executive Headteacher	Signed Director RCSAT
16/03/2020	<i>J. L. J. J.</i>	<i>P. B. B.</i>
13/10/2021	<i>J. M. Badger</i>	<i>P. B. B.</i>
30/09/2022	<i>J. M. Badger</i>	<i>P. B. B.</i>
30/09/2023	<i>J. M. Badger</i>	<i>P. B. B.</i>

Persons Responsible for Policy:	Executive Headteacher RCSAT
Approval Date	16/03/2020
Signed:	Director RCSAT
Signed:	Executive Headteacher RCSAT



Step 1 – Requests made prior to the last day of term

Any ROA requests made prior to the end of the summer term **must** be actioned and issued by the school within the statutory 30 day period. Requests that have been made during this period and where the 30 day deadline falls within the holiday period must be completed and cannot be extended simply because they will cross into the holiday period. It is up to the school to ensure a process is in place so that this occurs.

Step 2 – Communication

Aside from out of office notifications etc. as listed in Step 3, use any appropriate facility to ensure you get an appropriate message out to parents as to what the appropriate steps should be. This is a key point as it will demonstrate that you have taken appropriate steps to ensure your holiday procedure has been clearly communicated to parents.

Social Media – if you normally communicate to parents via social media ensure you use those facilities to communicate the appropriate procedure to them – for example, pin a relevant tweet at the top of your Twitter/Facebook account giving appropriate contact details.

Apps – if you use apps such as Teachers2parents to send parents texts and emails, make sure you communicate out of hours contact details, including for issues relating to data protection.

End of term newsletters/letters home to parents – make sure you include the contact details for the SchoolDPO.

Step 3 – Requests made during holiday periods

It is the school's responsibility to ensure that they have an appropriate procedure in place to allow for ROAs made during this period to be actioned. You will have to consider how to action requests over this period made via phone, email, web forms, post. It is your responsibility to ensure that any ROA is not 'overlooked' over this period and that you have put in place solutions that allow for all eventualities.

Recommendations

Phone – Any out of hours recorded message should also include a statement that says if the individual is calling about any data protection issue to contact the School's Data Protection Officer at SchoolDPO@cheshirewestandchester.gov.uk.

Online – Work with your web team to create a separate ROA/Data Protection Enquiry form and have the recipient address marked or CC'd to SchoolDPO@cheshirewestandchester.gov.uk so that any request or query will come through to us. Also ensure that any reference to data protection, breaches or ROA or SARS include the SchoolDPO contact details.

Email – As part of the out of office notification, ensure that you add details for all ROA/SAR or data protection enquiries to be sent to the SchoolDPO@cheshirewestandchester.gov.uk email address.

Post – You should take steps to ensure any post delivered during the holiday period is regularly checked by an individual. Some schools have the post during this period retained by the post office and collected at regular intervals by a member of staff to ensure nothing important is overlooked. It is up to you to determine how this can best be achieved over the period of school closure.

Step 4 – Appoint a contact

Schools need to identify a contact (this could be a single member of staff or a rota of staff covering different periods) to allow the SchoolDPO to advise them as to any ROA received during this period. The

nominated individual should also be able to assist in identifying the relationship of the requestor with the school in order to identify if a request is a repeat or could be considered vexatious or whether a request could be deemed complex given the amount of information involved. In some circumstances, the individual will be expected to provide the requested personal data to the SchoolDPO to arrange for redaction and issuing of the ROA (with school sign off). The school may decide the appropriate contact is the school's ICT Support who may need to authorise access to information. (see Appendix 1)

Step 5 – Reviewing an ROA

If you take the decision to 'funnel' requests to the SchoolDPO, then we will review any request that comes in and assess the appropriate steps to take. This will be to issue a holding letter to the requestor seeking identification and to inform them, once identification has been verified, as to the timescales for responding to their ROA.

The School DPO Team will liaise with the school contact to determine the complexity of a request. This may include a decision by the DPO to extend the deadline for compliance. Where there is clear evidence that an individual has clearly made a request during a school closure period to cause obvious disruption in the knowledge that the school is not open over this period, the School DPO may take the decision, based on other additional factors, to refuse a request.

Only the School DPO should take the decision to extend timescales or to refuse a request.

Step 6 – Information Gathering

The school must facilitate access to requested ROA material to allow for the School DPO team to undertake appropriate redactions or withholding of exempted data. This may be the responsibility of the nominated school contact and may require support from the school's ICT provider to allow for access to the likes of SIMS, email and other systems.

The procedure you adopt must be documented as part of your overall Right of Access/Subject Access Request Policy and made available on your website.

Appendix 1 – Holiday ROA Contact Details

School:		
Data Protection Contact (holiday period):		
Contact Email:		
Contact Number:		
Cover Period: (where more than one contact available over the holiday period, please state when each individual is nominated cover.)		

Please return this form to: SchoolDPO@cheshirewestandchester.gov.uk

