

## **Blueprint Education Services Subject Access Request Policy (November 2024)**

Blueprint Education Services is registered with the ICO. (**ZB081669**)

Under our service provision we do not collect nor hold personal data from individuals. We process data of individuals that are registered with learning organisations and that will be in receipt of learning funds against each registered individual.

BES recognise the requirements of Subject access requests and our data security breach and protocols explain how data is used and stored.

### **How SARs will be handled**

BES will allocate a director to undertake a review of SAR's when received. This review will confirm the identification and purpose of the SAR and its validity.

Requestors will receive a confirmation email to acknowledge our receipt of their SAR.

SAR's will be recorded by the DPO and held under secure password protected files.

We will undertake a reasonable search of data to identify relevant information held on the SAR subject.

## Subject Access Request Checklists and response template

### **Preparing for subject access requests**

- We know how to recognise a subject access request and we understand when the right of access applies.
- We have a policy for how to record requests we receive verbally.
- We understand what steps we need to take to verify the identity of the requester, if necessary.
- We understand when we can pause the time limit for responding if we need to ask for clarification.
- We understand when we can refuse a request and are aware of the information we need to provide to individuals when we do so.
- We understand the nature of the supplementary information we need to provide in response to a subject access request.
- We have suitable information management systems in place to allow us to locate and retrieve information efficiently.

### **Complying with subject access requests**

- We have processes in place to ensure that we respond to a subject access request without undue delay and within one month of receipt.
- We understand how to perform a reasonable search for the information.
- We understand what we need to consider if a third party makes a request on behalf of an individual.
- We are aware of the circumstances in which we can extend the time limit to respond to a request.

- We understand how to assess whether a child is mature enough to understand their rights.
- We understand that there is a particular emphasis on using clear and plain language if we are disclosing information to a child.
- We understand what we need to consider if a request includes information about others.
- We are able to deliver the information securely to an individual, and in the correct format.

## Response template

[Date][Reference number]

### Request

You asked us:

[Request wording]

We received your request on [date of receipt]

We have handled your request under the [specify whether it is the Freedom of Information Act (FOIA) or the Environmental Information Regulations (EIR), or both].

### Our response

[In this section you should explain:

- what information you hold, unless potential prejudice means that you need to [neither-confirm-nor-deny](#) that you hold it;
- how you hold information, if it is clear the requester does not understand the level of detail of information they are likely to be able to access from you;
- whether you are disclosing all the information requested, disclosing part of it, or withholding it all;
- why you need to withhold information, using plain English;

- the specific FOI [exemptions](#) or EIR [exceptions](#) you are relying on to withhold information – you should identify which section of the act or regulations applies; and
- the details of any [public interest test](#) you have carried out.

**Or**, if the request is vexatious, repeated or exceeds the cost limit, you can explain:

- which section of the FOIA **or** EIR you are relying on and refuse it outright. You do not necessarily need to describe the information you hold – check the [exceed the cost limits and vexatious request guidance](#) for further information.

**If** you don't hold any of the information requested, explain this in writing to the requester. If another public authority holds the information, transfer the request to them or advise the requester to redirect their request. Part III of the [section 45 code of practice](#) provides advice on transferring requests.

### **Advice and assistance**

[In this section you should explain:

- where the requester can find any publicly available information related to their request or their stated interests, if any exists;
- how the requester could re-word their request to receive a fuller disclosure of information, if appropriate; and
- whatever else might be useful to the requester based on their information needs]

### **Next steps**

You can ask us to review our response. If you want us to carry out a review,

please let us know within 40 working days. [Insert further details on your internal review process (eg who will carry out the review) or link to your internal review procedure, if it's publicly available.]

If you are still dissatisfied after our internal review, you can complain to the [Information Commissioner's Office](#) (ICO). You should make complaints to the ICO within six weeks of receiving the outcome of an internal review. The easiest way to lodge a complaint is through their website: [www.ico.org.uk/foicomplaints](http://www.ico.org.uk/foicomplaints). [if you have issued a hardcopy response to the requester through the post, it may be more appropriate to provide them with the ICO's postal address: Wycliffe House, Water Lane, Wilmslow, SK9 5AF.]