



Global Policing



Data Protection

Subject Access Request Process



Content:

Page 3 - Infographic and quick guide to Subject Access Requests

Subject Access Request explained

Page 4 - What happens when you receive a request?

Pages 5-6 - Subject Access Request time Frame

Pages 7- 8 - Global Policing Due diligence Checks

Pages 7- 8 - Confirmation Of Request

Pages 7 & 12 - School to send Documents Securely

Pages 9- 10 - Redacting

Page 11 - School sign off

Pages 12 & 13 - Sending and Receipt of request

Page 13 - Closing the Subject access request

SUBJECT ACCESS REQUEST PROCESS

1 School Receives a Request for information

- Contact Global Policing
- Forward individual to subject access request page <https://www.globalpolicing.co.uk/subject-access-request/>
- Alternatively email data@globalpolicing.co.uk

2 Global Policing Due Diligence Checks

- Global Policing to send out SAR email(See on page 8)
- Confirm individuals request
- Receive a copy of ID to verify individual
- Check with school on parental responsibility or safeguarding concerns
- Check age of subject
- **The request date does not start until we receive valid ID**

4 Global Policing Redact

- Global Policing to redact all documents in accordance with the Data Protection Act 2018
- Global Policing to send a copy of redacted documents to the school, prior to sending to individual.
- School To confirm no reviews needed.

3 School to Start Collecting Data

- Collect requested information within a **two week period**
- Send securely to Global Policing password protected (Egress or encrypted)

5 Complete Request

- Global Policing to send secure copy of redact files
- Explanation of data protection rights provided and how to contact ICO in the event of a complaint.
- Confirmation receipt of document sent kept on Global Policing files.
- Update school that this has been completed
- Any action points or support for further requests
- Close SAR





What Happens when you receive a request?

If you receive a request for Data from an individual or organisation,
Simply forward this to Global Policing - data@globalpolicing.co.uk
Or forward the individual to our website page;

<https://www.globalpolicing.co.uk/subject-access-request/>

This will kick start our Subject access request process, Global Policing will then confirm they have received the request and follow the next steps.

1. Confirmation of receipt with school
2. Confirmation Letter sent to requester, Outlining Global policing's role
3. Global Policing to correspond with school what documents to start gathering and Provide time Frame.
4. Global Policing to acquire ID and determine the information requested
5. School to provide documents to Global Policing within **Two week** period
6. Global Policing To redact
7. Global Policing to send to school for review
8. Confirmation of review to send documents to individual
9. Documents sent to individual
10. Receipt of receiving documents - Sent to all parties
11. SAR CLOSED



Data Request TimeFrame

Within the data protection act 2018 it is a requirement all requests are processed within a timely manner and **MUST** be completed within 28days.

Although Global Policing are here for support and do the main bulk of the request, we ask schools to please gather this information within a **two week** time period. This gives us ample time to go through documents, sometimes 300+pages long and redact meticulously.

The Request will not officially start until we have received ID, as part of Global Policing due diligence checks. However it remains that we will work off the original date of the request for receiving the data set.

In example, The school receives and email on the 1st March. We aim to get this completed by the 1st April. The school will need to send the information by the 15th March. This allows plenty of time in the circumstance other factors may arise.

Quick Guide:

School Two weeks to Gather and Send information to Global Policing

Global Policing One Calendar Month to complete request in full



Time Extension

The Data Protection Act 2018 states in the circumstance a request is complex, or simply by asking the individual you can extend the timeframe of a request. These are rare cases and only happen on the odd occasion.

An example of this could be a school received a request during the summer period, or the documentation amounts to way over 1000pages.

This will always remain a last resort as the Data Protection act states “You must comply with a SAR without undue delay and at the latest within one month of receiving the request”

Simply off putting a SAR is not Acceptable from both parties.



Global Policing checks

It is very apparent within a school setting that a multitude of organisations and individuals ask for a variety of information regularly. This includes parents, solicitors, courts and even the police.

We deal with each case on an individual basis, but we must first do our due diligence checks. What this means is that we must first identify the individual or organisation. This is done through checking valid ID, or enquiring with the organisation determining the role of the individual, who requested data on their behalf.

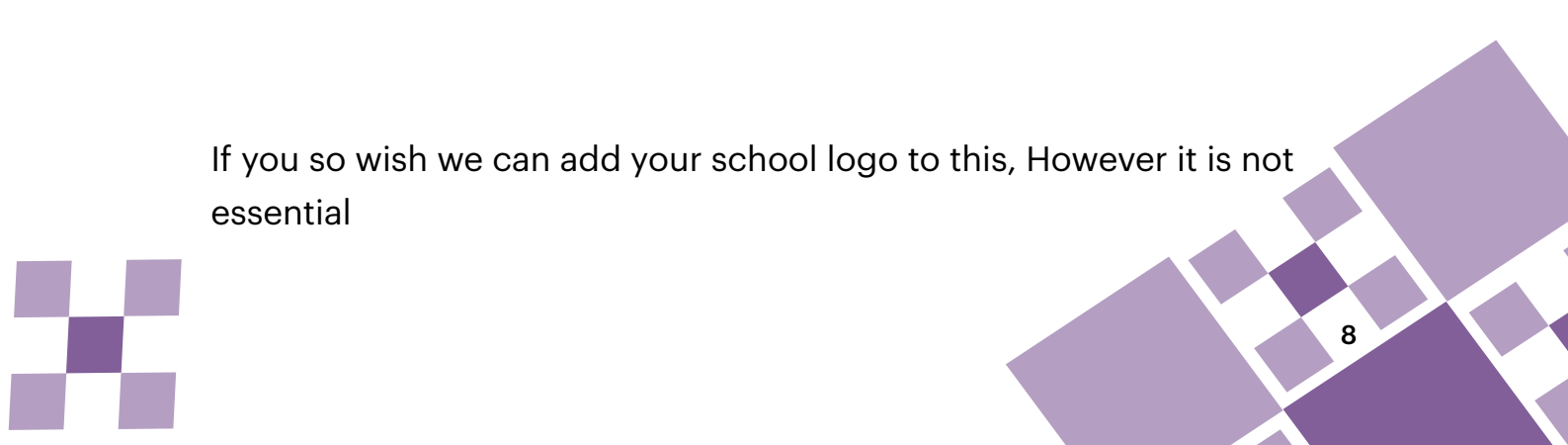

We cannot further a request without validating the authenticity of it and the individual. This in some circumstances will mean speaking with a member of safeguarding to determine the Parental rights of the Individual held on the system.

Confirmation of Information requested

Although through the Data protection act 2018 an individual does not need to give reasoning behind their request. Global Policing work with the individual to determine what exact information they are requesting. This not only significantly reduces the workload for the school and ourselves. It also ensures the individual receives the information they wish to receive, and prevents further request.

The school shall send this to Global Policing within the **two week** time frame securely. Using relevant system for example Egress.

Letter We send to the Requester



Global Policing

Data Protection

Dear - Insert Name

Re: your subject access request

Global Policing are the independent Data protection officers for (INSERT SCHOOL) We are a group of ex public services members who have varying responsibilities from ex chief inspector to detectives. What this means is we have a wealth of experience with confidential information and data.

Global Policing deal with all requests in relation to the school and provide our independently reviewed documents. The school has no input on what data is redacted.

We can confirm that (School Name) received your request on (Date) for the following set of data that we hold about: Insert name

Insert Data Requested

Insert Any relevant information, Narrow down request if needed.

For Global Policing to initiate your request we shall need a form of Valid Identification (i.e Drivers License, Passport) We will respond to your request within 1 month, as required under the Data Protection act 2018/ UK General Data Protection Regulation (UK GDPR) on receipt of your ID.

For further information, please contact ourselves Global Policing via Email: data@globalpolicing.co.uk Or Telephone: 0161 510 2999

If you disagree with the completed provided files, you can contact the Information Commissioner's Office by calling 0303 123 1113, or going to the following webpage: <https://ico.org.uk/global/contact-us/>

Best wishes,
Global Policing Data Team

If you so wish we can add your school logo to this, However it is not essential



Redacting

As you may potentially be aware, Redacting takes time and resources especially in the circumstance of complex cases. Global Policing are experts at getting through documentation with a keen eye to attention.

However we always aim for a **two week** period to complete the redacting, In some circumstances we have been provided the information one day prior to the request being completed. This then becomes extremely difficult for ourselves to complete this request within the timeframe.

We understand in some circumstances this is unavoidable I.E court order provided 1 day prior to the completion time. However we shall always work with the school to remain within this timeframe and understand at times this isn't always viable.

What do we redact?

Most redactions are quite simple and will be limited to personal identifiers such as First names, last names, and email address. However like most things its not always that simple, Sensitive data such as safeguarding needs to be done thoroughly.

A common system used in schools is CPOMS or MyConcern, both hold behavioural and safeguarding information. In the circumstance this is requested, we must provide this documentation. However this will be redacted in accordance with relevance and the risk to the Child or individual.

Each circumstance will be different, however in most instances we shall remove information such as, but not limited to;

Safeguarding information

Confidential information

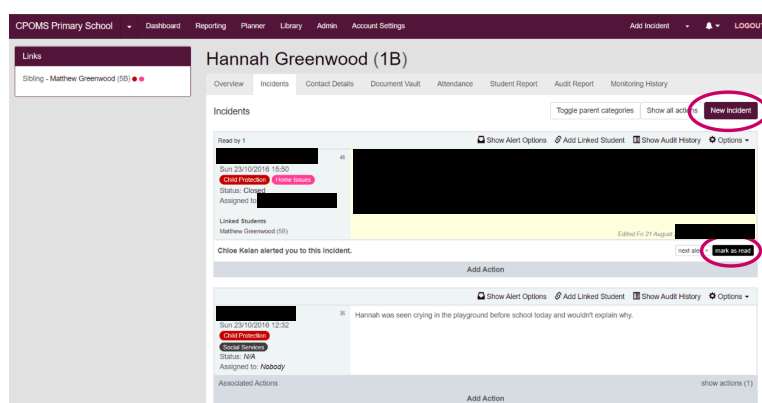
Contact with Outside agencies, Containing sensitive information or discussions

Information the can put the school into disrepute

Information that will cause Risk to the child or individual

Opinions and thoughts expressed by the child

Throughout this process Global Policing will ensure good contact with the establishment/school in order to determine the relevant information, or concerns surrounding the case.



Prior to Sending The Information

Prior to sending anything over to the requester Global Policing will always require the school to sign off. All forms of redaction are logged and provided to the school.

In the circumstance the school believes providing the information shall put the child at risk, or isn't happy with the documents we shall review and amend to fit the schools needs, However this must be in line with the Data Protection Act 2018.

Global policing remain as an advice and support service, so it is key to ensure both parties are following this procedure.

Global Policing

Data Protection

Insert school Name

Re: Subject Access Request

Please see below information and fill accordingly

☐ We can confirm we have received the redacted copies in relation to the current ongoing SAR.

☐ The school can confirm the documents meet their standard and can be sent to the requester

☐ The School requests a review of these documents and shall provide reasoning for doing so below:

Name of Requestor:
Date:
School staff Signature:

Best wishes,

Global Policing Data Team



Sending the Information

First instance when sending information to ourselves, Please use egress or a secure method of sending documents.

Once prior steps have been complete we are ready to send the information securely. Dependant on the individual or organisation we use different systems. All documents are password protected and the password is released on receipt.

For professionals we use Egress a secure email system. And for individuals we use WeTransfer.



WeTransfer allows us to monitor the receipt and download of documents, This helps ensure we follow key processes. And can determine exactly when it was received.

The WeTransfer logo features the words 'WeTransfer' in a bold, black, serif typeface, centered within a light gray rectangular box.

Closing the SAR

Once We have received the receipt for the SAR, It shall be considered closed. The individual or organisation can make enquires to ourselves, and we may potentially have to review.

In either circumstance Global Policing shall remain in contact or inform the school of closure.

Receipt of SAR



ACCEPTANCE OF DATA ACCESS REQUEST

Date: _____

Data Subject: _____

School: _____

- I accept full responsibility for the file provided to me by Global Policing
- Global Policing have been through both the redacted and unredacted material
- I am happy with the explanations provided for the non-disclosed material
- I am happy for Global Policing to return to the School all files left with them following our meeting
- There are no other outstanding requests
- I am aware that should I require more information, I can open another data access request.
- This data access request has been completed within the agreed time limit of 30 days, or has been extended with my agreement
- This data access request is now closed

N.B copy to data requestor – Global Policing – School

Signed: _____

Relationship _____

ID CHECKED ☐ Global Policing signed _____



