

NORTH STAR NURSERY AND HOLIDAY CLUB **DATA SUBJECT ACCESS REQUESTS PROCEDURE**

The General Data Protection Regulation 2018 introduces the 'right of access' for individuals and data subjects will have the right to request:

- Confirmation that their data is being processed;
- Access to their personal data; and
- Other supplementary information as set out in North Star Nursery's Data Protection Statements – Clients and Staff

Recital 63 of the GDPR states, "a data subject should have the right of access to personal data which have been collected concerning him or her, and to exercise that right easily and at reasonable intervals, in order to be aware of, and verify, the lawfulness of the processing."

Our processes for data subject access follow guidance from the Information Commissioners Office which can be found at <https://ico.org.uk/for-organisations/guide-to-data-protection/principle-6-rights/subject-access-request/>

1. Data subject access request procedures under the GDPR

1.1 In most circumstances, the information requested will be provided free of charge. North Star Nursery Ltd. may charge a "reasonable fee" (usually a maximum of £10) when we believe a request is manifestly unfounded, excessive or repetitive. This fee will be based on the administrative cost of providing the information.

1.2 North Star Nursery Ltd. will provide information without delay and within 30 days. Where requests are complex or numerous, North Star Nursery Ltd may extend the deadline to three months. However, we will still respond to the request within a month to explain why the extension is necessary.

1.3 Data subject access requests can be made in any form, including through email, phone call or web contact forms as well as verbally or manually (in writing).

1.4 North Star Nursery Ltd may ask you to clarify and specify what information it is you wish to access. The ICO states, "where you process a large quantity of information about an individual, the GDPR permits you to ask the individual to specify the information the request relates to (Recital 63)."

1.5 North Star Nursery Ltd will endeavor to provide any information you have requested in a clear and legible format. Under Recital 63, the GDPR also recommends that, where possible, "the controller should be able to provide remote access to a secure system which would provide the data subject with direct access to his or her personal data."

2. Procedures once a request has been made

Please see APPENDIX 1.

REFERENCES

<https://ico.org.uk/media/2419/Access-Aware-Checklist-Health.pdf>

<https://www.itgovernance.co.uk/blog/how-to-write-a-gdpr-compliant-data-subject-access-request-procedure/>

<https://ico.org.uk/for-organisations/guide-to-data-protection/principle-6-rights/subject-access-request/>

Preparing for the GDPR 2018 – ICO

This policy links to:	Health and Safety Policy Safeguarding Children and Child Protection Policy Special Educational Needs and Disabilities Policy Code of Conduct Security Policy Communication Policy Equality, Diversity and Inclusion Policy Privacy Policy – Client & Staff Confidentiality Policy Technology Policy Personal Use of the Internet Policy Staff Induction Staff Handbook Staff Training
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Policy Review History	
May 2018	v.1
September 2020	v.2

This policy will be reviewed in September 2022 unless a review of events, legislation or guidance from health professionals or Ofsted indicates that a review should take place sooner.

Signed **Dated**

Print **Nursery Manager**

Signed **Dated**

Print **Reviewing Committee Member**

APPENDIX 1

