



Safeguarding SAR Checklist for Schools

What to do — and in what order — when a subject access request lands

1 The day it arrives — start the clock

- ☐ **Log the date received.** The one-calendar-month clock starts the day the request arrives — however it arrives (email to any staff member, letter, verbal request, even social media).
- ☐ **Verify identity and authority.** For parental requests, confirm parental responsibility. For older pupils (especially secondary age), consider whether the request should come from — or be consented to by — the child.
- ☐ **Acknowledge receipt in writing** and tell your DPO the same day.
- ☐ **Only seek clarification if you genuinely need it** to identify the information sought — a valid clarification request can pause the clock; a spurious one won't.

2 Week one — scope it honestly

- ☐ **List every system that may hold relevant data:** MIS (SIMS/Arbor/Bromcom), safeguarding platform (CPOMS/MyConcern), staff email, shared drives, paper files, SEND records, behaviour logs.
- ☐ **Run email searches with agreed terms** (pupil name, initials, nicknames, family surname) and record exactly what you searched — you may need to evidence it.
- ☐ **Estimate the volume early.** If the request is complex or high-volume, you can extend by up to two further months — but you must tell the requester within the first month, with reasons.
- ☐ **Flag the sensitive material now**, not at the end: safeguarding records, social services and police information, and any document naming other pupils.

3 Redaction — where school SARs go wrong

- ☐ **Consider each third party individually.** The ICO expects a per-person judgement (can they consent? is it reasonable to disclose without consent?) — not blanket redaction of every other name.
- ☐ **Safeguarding material:** consider whether disclosure would be likely to cause serious harm to the child or another person — and involve your DSL in that judgement.
- ☐ **Social services, police and court material** can carry specific restrictions — flag it and check before disclosing; don't guess.
- ☐ **Teachers' opinions about the pupil are usually the pupil's personal data** — being uncomfortable to release is not a ground to withhold.
- ☐ **Keep a disclosure log:** every document withheld or redacted, and the reason. It's your evidence if the requester complains to the ICO.

4 Before you press send

- ☐ **Covering letter:** what's enclosed, what's been withheld and on what broad basis, and the requester's right to complain to the ICO.
- ☐ **Deliver securely** — encrypted file transfer or password-protected files sent separately from the password.
- ☐ **Record the completion date** and retain the disclosure log and search records.



Safeguarding SAR Checklist for Schools

What to do — and in what order — when a subject access request lands

! Warning signs it's bigger than it looks

- ☐ The request arrives mid-complaint, mid-exclusion, or alongside a staff grievance.
- ☐ It spans several years of email, or several children in one family.
- ☐ Safeguarding records are central to what's being asked for.

If any of those apply, don't absorb it into the office's week. VeriRequest does the triage, redaction and response pack for a fixed price agreed up front — your school reviews and sends. Triage and scoping are free: verirequest.co.uk