



Client Access to Records Policy

Introduction

Houghton and Wyton Pre-school is committed to transparency and the rights of individuals to access their personal data. This policy outlines the procedure for responding to subject access requests (SARs) under the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**.

Aim

To ensure that parents, carers, and individuals can request access to the records we hold about them or their child in a lawful, timely, and respectful manner.

Objectives

We will:

- Respond to access requests promptly and within statutory timelines
- Maintain the privacy of third parties when releasing records
- Ensure all staff understand their role in managing personal data
- Refer to legal or regulatory advice if needed

Roles and Responsibilities

- **Manager:** Coordinates responses to access requests and liaises with the Chair of Trustees if legal or safeguarding concerns arise
- **Board of Trustees:** Involved where redaction, refusal, or complaints may arise
- **All Staff:** Are aware of their duty to maintain accurate, respectful, and timely records

Implementation Procedures

1. Right of Access

Under UK GDPR Article 15, individuals have the right to:

- Know what personal data is held about them or their child
- Access that information, subject to legal exceptions
- Request correction of inaccurate information

2. Making a Request

- All access requests must be made in writing and signed by the parent/carer or person with legal responsibility
- The setting will respond within **30 calendar days** of receiving the request
- This period may be extended by up to **two months** in complex cases, with written notice given

3. Reviewing the Records

- The Manager reviews the record for accuracy, clarity, and relevance
- The file is checked for:
 - Sensitive data or references to other children, families, or staff
 - Information provided by third parties or external professionals
- Information that identifies another person will be:
 - Redacted (blacked out), or
 - Released only with written consent from that person

4. Refusals or Redactions Access may be restricted or refused if:

- The record contains safeguarding concerns or references that may put another person at risk
- Disclosure would breach a legal duty of confidentiality
- The request is deemed manifestly unfounded or excessive (as defined by the ICO)
- The individual making the request does not have legal parental responsibility

5. Redaction and Quality Control

- Staff may not rewrite, alter, or remove historical content from the record



Registered Charity # 1203754

- If third-party consent cannot be obtained, that information will be redacted
- A copy of the redacted version is reviewed and signed by the Manager and Chair of Trustees before release
- Families will receive a photocopy or scanned copy of the record; originals are never released

6. Complaints and Disputes

- If a parent or carer is unhappy with the outcome of their access request:
 - They may raise the issue under the **Complaints Policy**
 - They may contact the **Information Commissioner's Office (ICO)** at www.ico.org.uk

Monitoring and Review

This policy is reviewed **annually** by the Manager and Board of Trustees, or sooner if legislation, guidance, or operational needs change. See Retention Schedule for timelines on storing and archiving records.

Legislation and Guidance

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Statutory Framework for the EYFS (2023)
- Information Commissioner's Office (ICO) Guidance on Subject Access Requests

Acknowledgment

All staff and trustees must read and understand this policy. By doing so, they support the lawful and fair handling of personal information and promote the rights of individuals.