Data Subject Access Request (DSAR) & Deletion Request Policy

To be reviewed (annually): June 2021

Version number: 3

The Company	Vision for Education / ABC Teachers / Smart Teachers

Dealing with requests arising from UK GDPR

Under the UK General Data Protection Regulations (UK GDPR) our data subjects (candidates) have the right to:

- Be informed about the personal data the Company processes about them
- Access the personal data the Company processes about them
- Rectification of their personal data
- Erase their personal data in certain circumstances
- Restrict processing of their personal data
- Data portability in certain circumstances
- Object to the processing of their personal data that was based on a public or legitimate interest, and
- Not to be subjected to automated decision-making and profiling.

To comply with UK GDPR, the data subject must receive a response giving the actions taken within one calendar month. Under certain circumstances, the one calendar month period may be extended. To monitor these timeframes and ensure compliance with the request, the following procedures will be adopted:

- All requests will need to be submitted in writing to dpo@abc-teachers.co.uk /dpo@visionforeducation.co.uk/ dpo@smartteachers.co.uk. The written request can be sent by the candidate or by the person who has received the request verbally or otherwise.
- This will allow the Company to be confident it is capturing all requests and will give a definitive date on which the request was made.
- Those responsible for monitoring the dpo@ mailboxes will record the name of the data subject, their email address (as a method of identifying them specifically) and the date of request in the DSAR spreadsheet.
- The recording of information at this point is key. Access to the spreadsheet will be limited only to those people who record and manage the process and the Accounts team, who will investigate last day worked to guide the actions available in line with the Data Retention Policy.

Data subject access requests (DSAR)

- Assess the request to determine if the candidate requires full file or certain documents from the file. Where necessary, the data subject will be asked for additional parameters or clarification if a large request has been submitted.
- The relevant documentation will be collated from digital and paper formats and any central repositories and inboxes.
- All documents within the file will be assessed by the data champion to determine if any documents should be withheld, redacted or exempt.
- All documents will be emailed to the candidate in pdf format and will be password protected. This will only be sent to the email address held on the candidate's file.

Deletion requests

- Once we have established the last day of work/date of registration/file creation date, we will use the Data Retention Policy to determine which information can be deleted and which information should be retained.

  Under the Conduct Regulations, we must keep different documentation for differing periods of time. This legal requirement will guide the outcome of the deletion request. Having this documented on the shared spreadsheet will allow us to standardise the responses across the supply businesses. This sharing model will also allow a consensus to be reached on the more ambiguous or complex requests.
- Should the candidate request a full deletion, any staff who has had any involvement with the candidate will be contacted to delete any emails or data in relation to the candidate.
- The deletion request will then be passed to the Salesforce team for actioning on the CRM.
- Once the request has been actioned, the data subject will be contacted and the actions taken will be communicated. The timeline of actions, including the data subject identity, will be held on the One drive. We have a legitimate interest in doing this as should we ever need to restore the system from a back-up, we maintain the data subject's requests and actions taken.

National Tutoring Programme (NTP)

Pupil Data Subject Access Requests

Should a school inform us that a pupil who has taken part in the NTP has submitted a DSAR, the following procedure will be followed:

1. Ask the Head Teacher/Principal, school DPO or Tuition Lead to put the request in writing to the agency DPO email:

- dpo@visionforeducation.co.uk
- dpo@abc-teachers.co.uk
- dpo@smartteachers.co.uk

2. We will collate all data which we currently hold (first name, initial, dates of tutoring sessions and feedback from tutoring sessions). This data will be collected from our NTP portal and/or the school's individual OneDrive folder.
3. The data will be assessed by the Data Champion to determine if anything should be withheld, redacted or exempt.
4. All data will be made available to the school through the school's individual OneDrive folder for their use in the DSAR and an email will be sent to the school to confirm that this has been done (see Template 1 below).
5. Ask the Head Teacher/Principal, school DPO or Tuition Lead to confirm in writing to the agency DPO email (see point 1. for agency DPO email address) that the information has been provided to the pupil.

Template 1 – Email to school to confirm that pupil DSAR data is in OneDrive

Dear INSERT NAME,

Following the pupil Data Subject Access Request (DSAR) which you informed us of on INSERT DATE, I can now confirm that all data related to this individual has now been placed in the INSERT FOLDER NAME folder in your school's secure OneDrive. The folder will be available for you to access for the next 48 hours after which time the data will be deleted from the OneDrive.

I would be grateful if you could confirm in writing that this information has been passed onto the pupil.

Kind regards,

INSERT NAME

Pupil deletion requests

Should a school inform us that a pupil who has taken part in the NTP has submitted a deletion request, the following procedure will be followed:

1. Ask the Head Teacher/Principal, school DPO or Tuition Lead to put the request in writing to the agency DPO email:

- dpo@visionforeducation.co.uk
- dpo@abc-teachers.co.uk
- dpo@smartteachers.co.uk

2. We will identify the data which we currently hold on our NTP portal and/or the school's individual OneDrive folder.
3. We will assess which data can be deleted and which data needs to be kept for NTP reporting purposes.
4. Data that can be deleted will be deleted.
5. An email will be sent to the school to confirm that this has been done (see Template 2 below).
6. Ask the Head Teacher/Principal, school DPO or Tuition Lead to confirm in writing to the agency DPO email (see point 1. for agency DPO email address) that the pupil has been informed that their data has been deleted.
7. All pupil data, along with any associated tutoring session information, will be deleted as soon as practicable after we are informed by the NTP that it has ceased to be appropriate to retain the NTP data. All NTP data will be erased from any computers, storage devices and storage media. We will take all further action as may be necessary or desirable to ensure our compliance with data protection legislation and our Privacy Policy.

Template 2 – Email to school to confirm that pupil data has been deleted

Dear INSERT NAME,

Following your request to delete all personal data for INSERT NAME from DELETE AS APPLICABLE Vision for Education's/ABC Teachers'/Smart Teachers' systems, which we received on INSERT DAY/MONTH/YEAR, I can now confirm that this has been actioned and all data has been removed.

I would be grateful if you could confirm that you have informed the pupil that their data has been deleted.

Kind regards,

INSERT NAME