

Data Subject Access Request

Copy Holder Information

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1. Introduction

BioGrad Education is committed to ensuring that individuals can exercise their rights under the **UK General Data Protection Regulation (UK GDPR)** and **Data Protection Act 2018 (DPA 2018)**. This Data Subject Access Request (DSAR) Policy & Procedure outlines the process by which individuals can request access to the personal data we hold about them and explains how BioGrad Education will respond to such requests.

A Data Subject Access Request (DSAR) allows individuals to obtain a copy of the personal data we hold on them and further information about how it is being processed. This policy ensures that all requests are handled in accordance with the legal requirements under data protection laws.

2. Purpose of a DSAR

The purpose of this policy is to establish a clear process for individuals (data subjects) to make requests regarding the data BioGrad Education holds about them. This process ensures that we comply with the **UK GDPR** rights of individuals, including their right to:

- Access personal data held by BioGrad Education.
- Obtain information on how their personal data is processed.
- Correct or request deletion of inaccurate or incomplete personal data.

3. Scope

This policy applies to all individuals whose personal data is processed by BioGrad Education, including:

- Students and staff
- Contractors and suppliers
- Job applicants
- Any other individuals whose data BioGrad Education processes

4. Making a Data Subject Access Request

Individuals wishing to make a DSAR should submit their request in writing. This can be done via email to the **Data Protection Officer (DPO)** at dpo@biograd.co.uk or by using

our online form available on the BioGrad Education website. The request should include the following information:

- Full name of the data subject
- Contact details (address, email, and phone number)
- Description of the personal data they wish to access or further details about their request
- A clear statement of the data subject's relationship with BioGrad Education (e.g., student, staff member, etc.)

5. Verifying the identity of the Requestor

To ensure the security of personal data and avoid unauthorized access, BioGrad Education will take steps to verify the identity of individuals making a DSAR. This may include requesting additional identification documents (e.g., passport, driving license) before the request is processed.

If additional verification is required, BioGrad Education will notify the requestor and specify what documents are needed.

Where further clarification or information is required, BioGrad Education may suspend the one-month response period until the necessary details have been obtained.

6. Responding to a DSAR

BioGrad Education will process all valid DSARs within **one month** of receiving the request.

Where further clarification or information is required, BioGrad Education may suspend the one-month response period until the necessary details have been obtained.

If a request is particularly complex or numerous, BioGrad Education may extend the deadline for a further **two months** but will notify the individual within the first month of the delay and the reason for it.

When responding to a DSAR, BioGrad Education will provide:

- A copy of the requested personal data in a structured, commonly used, and machine-readable format.
- Information on the purposes of processing, the categories of data being processed, the recipients of the data, and the retention period for the data.
- Any other information required under the **UK GDPR**, including the source of the data if it was not provided directly by the individual.

7. Exemptions

Certain exemptions may apply when processing a DSAR. BioGrad Education may withhold personal data if:

- The data relates to another individual who can be identified from the data (unless they consent to the disclosure).

- The request is manifestly unfounded or excessive (e.g., repeated requests).
- The data is subject to legal privilege, confidentiality obligations, or other legal restrictions.

BioGrad Education will assess each Data Subject Access Request (DSAR) to determine whether it is reasonable and proportionate in scope. Where appropriate, the Data Subject may be asked to narrow or clarify their request to ensure it remains proportionate.

If, after this assessment, BioGrad Education determines that the DSAR is manifestly unfounded or excessive, the request may be refused. In such cases, BioGrad Education will provide a written response outlining the reasons for refusal and the legal basis for doing so. The Data Subject will also be informed of their right to lodge a complaint with the Information Commissioner's Office (ICO).

8. Charges

BioGrad Education does not charge for processing a DSAR in most cases. However, we may charge a reasonable fee or refuse to process the request if the request is manifestly unfounded or excessive. If a fee is required, we will notify the individual in advance.

9. DSAR Procedure

1. **Submission of Request:** The individual submits a written request for their personal data.
2. **Verification:** BioGrad Education verifies the identity of the individual making the request.
3. **Assessment:** BioGrad Education assesses the request to determine the information held and whether there are any exemptions.
4. **Response:** BioGrad Education responds to the request within one month, providing the requested data or an explanation for refusal.

10. Record Keeping

BioGrad Education will maintain records of all DSARs, including the date of the request, the individual's details, the information provided, and any communication with the individual regarding the request. These records will be retained in accordance with our **Data Retention Policy**.

11. Right to Complain

If an individual is dissatisfied with the way their Data Subject Access Request (DSAR) has been handled, or with the response they have received, they have the right to raise a complaint with the Information Commissioner's Office (ICO).

Contact details:

Website: www.ico.org.uk

Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, United Kingdom.

12. Policy Review

This Data Subject Access Request (DSAR) Policy & Procedure will be reviewed periodically to ensure compliance with **UK GDPR** and any other relevant legislation. Any updates or changes to the policy will be communicated to stakeholders.

Appendix	Description

Version	Summary of Change	Author	Date
1	New Document	Daniel Williams	23/10/2025

Start Date/Adoption of Policy Date	23/10/2025
Document Owner	Daniel Williams
Reviewed by	Andy Russell

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