



Hampshire  
County Council

Legal Services

# Making SARs Manageable

19<sup>th</sup> March 2025

Emma Licciardi – School Legal Support



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# Help!

- Hampshire Services for Schools Platform

SAR information under Resources / Hampshire Legal Services / Information Law and Data Protection / Advice and Guidance

- School Legal Support

[Schoollegalsupport@hants.gov.uk](mailto:Schoollegalsupport@hants.gov.uk)

Tel: 01962 847594

# What will be covered

- Brief overview of the SAR process
- **Tip 1** Narrowing down the scope
- **Tip 2** If complex, extend the deadline
- **Tip 3** Speedy redaction
- **Tip 4** Keep to the legal requirements, no more no less
- **Tip 5** Handling post disclosure questions and complaints

# • Brief overview of the SAR process

- Request made by an individual under the UK GDPR/ Data Protection Act 2018 for personal data relating to them or their child
- When can I refuse?
- Consent required if student is 13+
- Deadlines. Usually one calendar month BUT....
- Gather in records, apply exemptions, disclose what is left, keep central record
- Can I charge for this?
- Templates available from School Legal Support:
  - Initial acknowledgement
  - Extension notification
  - Email asking staff to check their records
  - Cover letter for disclosure pack

- **Tip 1** **Narrowing down the scope**

- If in doubt, ask the requester – please could you narrow down by type of record, recipient/sender, subject, time period
- Focus on what they really want
- Duty to make *reasonable* searches. What is “reasonable” and where to look
- Best approach for emails
- Best approach for CCTV

- **Tip 2 If complex, extend the deadline**

- Telling, not asking
- Maximum = 3 calendar months
- Nature of records rather than volume

- Tip 3

## Speedy redaction

- Where entire record is exempt, do not include it at all (manual cut and paste)
- Black pen is easiest for incidental redaction

- **Tip 4 Keep to the legal requirements, no more no less**
  - NO - Index
  - NO - Chronology
  - NO - Sorting the disclosure in particular order
  - NO - Multiple copies
  - All the legal information you need to explain is in the template covering letter
  - If requester asks for disclosure by email, try to comply but it may not be feasible for high volume disclosure

# • Tip 5 Handling post disclosure questions and complaints

- “Where is X email from Y date?”
  - no problem if now located, “Thank you for helping us find what you wanted”
- “Where is the note of your conversation with my ex-husband?”
  - No problem if checks show you have disclosed all non-exempt records, “We have shared everything you are entitled to see, the exemptions we have applied were explained in the covering letter”
- Try to avoid your formal complaints procedure for SAR related complaints. More efficient for everyone if requester complains to the Information Commissioner’s Office after the school’s review (statutory process)
- Your DPO is the independent contact about data matters

# Any questions?

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