



# Guidance Note

**Title: Subject Access Request (Right to Access)**

**Version No: v1.5**

**Last reviewed<sup>1</sup>: September 2026**

**Summary:** To provide guidance to making and processing Subject Access Requests (Right to Access), submitted under Data Protection legislation (UK GDPR & Data Protection Act 2018).

**Accessibility:** If you would like this information in an alternative format, e.g. Easy to Read, large print, Braille or audio tape, or if you would like the procedure explained to you in your language, please contact the College's marketing team on 01603 773 169.

**Further information:** If you have any queries about this policy or procedure, please contact the Information Compliance Team [data\\_protection@ccn.ac.uk](mailto:data_protection@ccn.ac.uk)

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<sup>1</sup> The Review Period refers to our internal policy review process. The published policy is current and is the most recent approved version

# Contents

|                                                                      |   |
|----------------------------------------------------------------------|---|
| 1. Overview.....                                                     | 3 |
| 2. Submitting a Subject Access Request.....                          | 3 |
| 3. Is there a fee to submit a Subject Access Request?.....           | 4 |
| 4. Can someone else make a Subject Access Request on my behalf?..... | 4 |
| 5. How long do CCN have to respond? .....                            | 4 |
| 6. What information is covered by the Subject Access Request.....    | 5 |
| 7. Will I receive all the information I've requested?.....           | 5 |
| 8. How will my information be provided? .....                        | 5 |
| 9. What if I don't hear from you within a month?.....                | 5 |
| 10. Excessive and Repetitive Requests.....                           | 6 |
| 11. Data Protection Complaints .....                                 | 6 |
| 12. Contact us .....                                                 | 6 |
| Appendix 1: Requests for CCTV or BWC footage.....                    | 7 |

## 1. Overview

A Subject Access Request (SAR) is a request made by an individual to City College Norwich (CCN) under the UK General Data Protection Regulation (UK GDPR) for access to the personal data the College holds about them.

The purpose of a SAR is to enable individuals to understand and verify how their personal data is being processed. If CCN is processing your personal data, you are entitled to:

- A copy of your personal data (subject to any applicable exemptions).
- Information about why your data is being processed.
- A description of the personal data concerned.
- Details of any recipients, or categories of recipients, who have received your data (subject to any applicable exemptions).
- Information about the source of the data, where it was not obtained directly from you.
- An explanation of any automated decision-making that affects you.

CCN will respond to all SARs as soon as practicable and no later than one calendar month from receipt of the request.

### **Sector-Specific Requirements**

Whilst the principles of the UK GDPR and Data Protection Act 2018 apply across the education sector, certain provisions relating to educational records and parental rights apply differently to maintained schools and academies than they do to Further Education and Higher Education institutions.

### **Parental Access Requests in Further Education**

In a FE/HE College, students have their own rights under the UK GDPR and DPA 2018. Unlike maintained schools, parents do not have an automatic right to access a student's personal data or educational records. Any request from a parent or guardian will be considered on a case-by-case basis, taking into account the student's age, capacity, wishes, any consent provided, and the College's legal obligations. Where a student is capable of exercising their own rights, the College will normally communicate directly with the student regarding requests for access to their personal data.

### **Subject Access Requests Generated Using Artificial Intelligence (AI)**

Individuals may choose to use Artificial Intelligence (AI) tools to help draft a Subject Access Request, and this is entirely acceptable. However, AI-generated requests can sometimes be broad or lack the detail needed to identify the personal data being sought.

Where clarification is required, the College may need to contact the requester before proceeding. This can result in delays while sufficient information is obtained to enable targeted and proportionate searches. To help avoid delays, requesters are encouraged to provide clear details of the information required, including relevant dates, departments, or areas of activity where possible.

## 2. Submitting a Subject Access Request

You do not need to refer to the UK GDPR or use the term Subject Access Request (SAR) for your request to be valid, although doing so can help the College identify and process your

request more efficiently.

A SAR can be made in a variety of ways, including by telephone, email, post, in person, or by completing the College's Subject Access Request Form. However, your request must clearly describe the information you wish to receive.

Where possible, requests should be submitted in writing. This helps ensure that your requirements are clearly understood and provides a record of the information requested.

If a request is made verbally, the College may write to you to confirm its understanding of the request. You will have the opportunity to confirm or clarify the details before processing begins.

Where a request is unclear or too broad, the College may ask for further clarification.

To protect personal data, the College will also require proof of identity before releasing information. Photographic identification, such as a passport, driving licence or Student ID, is preferred. In some circumstances, alternative evidence, such as a recent utility bill or proof of means-tested benefits, may be accepted.

Where the name on the identification provided differs from the name held by the College, additional evidence may be required to verify the link between the two names. Any original identification documents submitted to the College will be returned securely.

### 3. Is there a fee to submit a Subject Access Request?

Subject Access Requests are normally provided free of charge.

However, where a request is considered manifestly unfounded or excessive, particularly if it is repetitive, the College may charge a reasonable fee to cover the administrative costs of responding. In such cases, the College will notify the requester within one month of receiving the request, explaining the reason for the fee.

### 4. Can someone else make a Subject Access Request on my behalf?

Yes. A Subject Access Request may be submitted by another person on your behalf, provided they can demonstrate that they have your authority to do so.

Requests made by a parent, family member, legal representative or other third party must be accompanied by written authorisation from you, or other appropriate legal authority, such as a Power of Attorney where applicable.

The requester will also be required to provide proof of your identity before any personal information is disclosed.

### 5. How long do CCN have to respond?

CCN will respond to Subject Access Requests within one calendar month of receipt. Where a request is particularly complex or where multiple requests have been received from the same individual, this timescale may be extended by up to a further two months. If an extension is required, CCN will notify you within the first month and explain the reasons for the delay.

You will normally receive an acknowledgement of your request. If you have not received one within five working days, please check your junk mail folder or contact the College to confirm that your request has been received.

If you receive an out-of-office response directing you to submit your request to an alternative contact, you should do so promptly. A request will generally be treated as received once it reaches the appropriate College contact responsible for handling Subject Access Requests.

## 6. What information is covered by the Subject Access Request

A Subject Access Request covers any personal data that CCN holds about you. Personal data is any information that identifies, or could be used to identify, an individual.

This may include information held in a variety of formats, such as paper records, electronic files, emails, database entries, audio recordings, and CCTV footage. Further information relating to CCTV requests can be found in Appendix 1.

## 7. Will I receive all the information I've requested?

CCN will make every effort to provide the information you have requested. However, there may be circumstances where some information cannot be disclosed due to legal obligations or exemptions under data protection law.

Where the information contains personal data relating to other individuals, CCN may redact relevant sections to protect their privacy. In some cases, where redaction is not sufficient, the information may need to be withheld entirely.

Where appropriate, CCN may seek consent from the other individual(s) to disclose the information. If consent is provided, the information may be released.

If any information is withheld, CCN will explain the reasons for doing so as part of its response.

## 8. How will my information be provided?

CCN will, wherever possible, provide your information using your preferred method. Where information is sent electronically, appropriate security measures will be used, which may include encryption.

If information is sent by post, CCN will use a secure postal service. Alternatively, arrangements can be made for you to collect the information in person from a CCN campus.

## 9. What if I don't hear from you within a month?

If you have received an acknowledgement but have not received a response within one month, please contact the College. While delays are uncommon, there may be occasions where a response has been delayed or an email has not been successfully delivered.

If the College is responding by post, please allow a few additional days for delivery before contacting us.

## 10. Excessive and Repetitive Requests

While the College is committed to supporting individuals' data protection rights, a Subject Access Request may be considered excessive if it is repetitive or places a disproportionate burden on the College. Although there is no limit to the number of requests an individual may submit, the College is not required to repeatedly provide the same information where a substantially similar request has already been fulfilled and a reasonable period has not elapsed.

In assessing whether a request is excessive, the College will consider factors such as the frequency of requests, whether the information has previously been provided, the scope of the request, and the resources required to respond. Where a request is considered manifestly unfounded or excessive, the College may charge a reasonable fee or refuse to comply, in accordance with the UK GDPR and Data Protection Act 2018. Each request will be considered on its own merits.

## 11. Data Protection Complaints

The College is committed to handling personal data in accordance with data protection legislation. Any individual who has concerns about how the College has collected, used, shared, retained, or otherwise processed their personal data may raise a complaint with the College.

Data protection complaints will be managed in accordance with the College's Data Protection Complaints Policy, which sets out how complaints can be submitted, investigated, and resolved.

Details of the process can be found in the Data Protection Complaints Policy, available on the College's website and staff intranet.

## 12. Contact us

To avoid delays and to ensure any Subject Access Requests are processed by the appropriate department, please direct your enquiry to the Information Compliance team:

**Department:** Information Compliance Team

**Tel:** 01603 773421 / 773176

**Email:** [data.protection@ccn.ac.uk](mailto:data.protection@ccn.ac.uk)

**Postal address:**

Information Compliance Team

City College Norwich

Ipswich Road Norwich

NR2 2LJ

## Appendix 1: Requests for CCTV or BWC footage.

You may request CCTV or Body Worn Camera (BWC) footage as part of a Subject Access Request. Requests can be made verbally or in writing; however, written requests are recommended as they help ensure the College receives all the information needed to locate the footage, such as the date, time, location, and a description of the individual concerned. Providing these details can help the College process the request more efficiently and reduce the risk of delays.

### **Making a request:**

Clearly state your request. Explain that you are making a Subject Access Request for CCTV/BWC footage where you are identifiable. Be specific about the footage, if you know the location or nature of the incident, provide this information.

Provide details to help identify you, this should include:

- A specific time and date and location.
- A description of yourself
- Proof of your identity (e.g., passport, driving license).

### **Failing to provide this information may delay your request.**

### **CCTV Retention:**

Please note that CCTV and Body Worn Camera (BWC) footage is retained for up to **30 days** before being automatically deleted. Requests for footage should therefore be submitted as soon as possible to ensure the relevant recordings remain available. Footage older than 30 days cannot be retrieved.

### **Redaction of third-party data:**

To protect privacy and comply with data protection legislation, any third-party individuals captured in CCTV or BWC footage will be redacted or masked. You will only be provided with footage in which you are identifiable.

### **Footage you are not permitted to access:**

You cannot access CCTV or BWC footage that relates solely to third parties. For example, if your vehicle is damaged and the incident is captured on CCTV, the footage may not be disclosed under a Subject Access Request, as your vehicle is not considered personal data. Only footage containing your personal data can be considered for disclosure.

In these circumstances, you may wish to contact the police or your insurance provider, who can request the relevant footage directly from CCN where appropriate.

### **Unless otherwise specified, any release of CCTV/BWC footage will be made electronically.**

All requests should be submitted to the Information Compliance team:

**Email:** [data.protection@ccn.ac.uk](mailto:data.protection@ccn.ac.uk)

### **Postal address:**

Information Compliance,  
Ipswich Road Norwich  
NR2 2LJ