

## GDPR027 - Third Party Matrix – Subject Access Requests

This table is intended to help you make decisions about how to approach different types of third party information you are likely to come across when processing a subject access request. We have provided ‘rules’ as far as possible, however every request and item of information should be dealt with on a case by case basis.

If you have any queries please contact your Data Protection Officer at [schoolsDPO@veritau.co.uk](mailto:schoolsDPO@veritau.co.uk) and on 01609 53 2526

Type of information	OK to disclose, without consultation	Advise about disclosure	Seek views on disclosure (remember – information should only be withheld if a valid exemption applies)	Redact
<b>General</b>	Any information which you are <b>certain</b> the applicant has received from the school, from another source, or which was provided to the organisation by the applicant.			All mobile numbers, apart from the applicant’s, unless you are certain they are already known to the applicant.
	Any information to which the applicant has a statutory right of access, under legislation other than the Data Protection Act 2018 (DPA).			All <b>personal</b> information of employees (of any organisation), for example information about their sickness, leave, etc.
<b>Name of staff members</b>	Names of staff members should be kept in files as data subjects have a right to know who in the organisation has had involvement with their case and why.	Governors – if you are disclosing any information they have provided	Staff members, if you think they might have concerns about information provided by them or about their involvement in the case. Information of which the staff	Names where disclosure might put a member of staff at risk, in which case their names can be redacted but the decision should be authorised by a suitably senior member of staff

			member may not be aware (for example if they are quoted as having given an opinion)	and following consultation with the DPO Names of staff who are not known to the applicant and don't have direct involvement in the case. Information where there is concern about disclosure and an exemption applies
<b>Third party professionals</b>	Names of and information from third party, non-medical professionals, or details of their involvement in the case, where the information is known to the applicant.	Names of and information from third party, non-medical professionals, or details of their involvement in the case, where the information is not known to the applicant but is not contentious.	Names of and information from third party, non-medical professionals, or details of their involvement in the case, where you consider that they may have concerns about disclosure. You can redact their names and contact details if they request, but not usually their job titles. Additional information may be redacted if you become satisfied that an exemption applies.	Names of employees with no direct involvement with the applicant or their case (for example administrative staff)
<b>Medical information</b>	Information from medical professionals, or details of their involvement in the case where the information is known to the applicant		Information from medical professionals, or details of their involvement in the case, which is not known to the applicant. If consent is refused, contact the DPO. Names should not be redacted if the information is disclosed.	

<b>Information relating to other pupils</b>				Names of and information about other pupils should usually be withheld, even if it is known to the applicant
<b>Information received from or related to private third parties, including family members</b>	Information received from a private third party where, using your professional judgement, you decide that in all the circumstances of the case, it will be possible and appropriate to redact sufficient information to hide the identity of the third party, without consulting the third party. This may be the case particularly if the information is historic. Also, names of family members if the context is factual and well known to the applicant (unless there is cause for concern in an exceptional case)	Information relating jointly to the data subject and a private third party individual which, in your professional judgement, in all the circumstances of the case, is not contentious.	Information relating jointly to the data subject and a private third party individual where you consider that they may have concerns about disclosure.	Information received from an identifiable private third party, where you are unable to consult a third party or consent to disclose is refused, you will need to decide whether disclosure should still be made.
				All information relating solely to a private individual third party which does not impact on the applicant. This would include information about an applicant's sibling's behaviour.
<b>Information provided by the applicant</b>	Information provided directly by the applicant, for example by telephone, email or during a meeting.			

<b>Historic information</b>	The majority of information relating to the applicant can be disclosed.	Only advise third parties where reasonable to do so due to the time that may have elapsed. The older the information the less likely you are to be able to do this.	Only seek consent from third parties where it is reasonable to do so due to the time that may have elapsed. In most cases you will need to decide if it is reasonable to disclose the information without this.	Information solely relating to third parties should be redacted as normal. Other exemptions may also apply where necessary although the associated risks may lessen dependent on how long ago the information was processed.
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