All Saints Church of England Primary School

'Playing our part in God's plan as we journey together to achieve the best for ourselves and others.'

Data Protection Complaints Policy

1. Purpose

This policy sets out how the school will manage complaints relating to the processing of personal data, in line with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and the Data (Use and Access) Act 2025.

This policy applies where an individual (data subject) is dissatisfied with how the school collects, uses, shares, stores, or otherwise processes personal data.

Data protection complaints are managed separately from the school's general complaints procedure, as required by statutory guidance.

2. Scope

This policy applies to complaints relating to:

- Subject access requests (SARs)
- Data sharing
- CCTV
- Safeguarding and pupil records
- Data accuracy and retention
- Data security incidents or breaches
- Any alleged infringement of data protection law

It applies to pupils, parents/carers, staff and any other individuals whose personal data is processed by the school.

3. Right to Complain

Individuals have the right to complain directly to the school if they believe that their personal data has been processed in a way that breaches data protection law.

The school will:

- Ensure accessible and straightforward routes to submit a complaint

4. Making a Complaint

Complaints can be made via:

- adminoffice@allsaints-pri.hants.sch.uk

Where complaints are received through other channels, staff will ensure they are promptly forwarded to the appropriate person. The complainant does not need to use legal terminology for the complaint to be valid.

5. Identifying a Data Protection Complaint

Not all concerns will constitute a formal data protection complaint. The school will consider whether the concern relates to:

- The handling or processing of personal data
- A potential breach or infringement of data protection law

Where unclear, the school may seek clarification from the individual.

6. Recording Complaints

All data protection complaints will be:

- Logged promptly upon receipt
- Recorded in a secure complaints record system

Records will include:

- Date received
- Nature of the complaint
- Actions taken
- Communications with the complainant
- Outcome

7. Acknowledgement

The school will:

- Acknowledge receipt of the complaint within 30 days (as required by law)
- Aim to acknowledge within a shorter timeframe where possible
- Where a full response is provided within 30 days, a separate acknowledgement may not be necessary

8. Investigation

The school will take appropriate steps without undue delay to:

- Investigate the complaint
- Make enquiries proportionate to the issue
- Keep the complainant informed of progress

Timescales will depend on:

- Complexity of the issue
- Scope of the complaint
- Any risk or harm to the complainant

The school will avoid applying fixed timescales where a quicker resolution is possible.

9. Outcome

The complainant will be informed of the outcome without undue delay.

The outcome will include:

- Findings of the investigation
- Any actions taken
- Any remedies or improvements implemented (where appropriate)

10. Escalation

If the complainant remains dissatisfied, they may:

- Raise further concerns with the school, or
- Complain to the Information Commissioner's Office (ICO)

The school will ensure that individuals are aware of this right through its privacy notices.

11. Roles and Responsibilities

The School is the Data Controller and the Headteacher is the Data Protection Officer and manages overall responsibility for compliance with this policy and ensure appropriate procedures are in place.

Data Protection Lead / Administrator is Lally Hodan who manages complaints processes, maintains records and coordinates investigations

All Staff:

- Recognise potential data protection complaints
- Forward concerns promptly

12. Training and Awareness

The school will ensure that:

- Staff and governors are trained to recognise data protection complaints
- Complaints received via any route are correctly identified and escalated

13. Monitoring and Review

The school will:

- Review complaints to identify trends and lessons learned
- Implement improvements where required
- Monitor compliance with statutory requirements

14. Links with Other Policies

This policy should be read alongside:

Data Protection Policy, Privacy Notices (pupil, parent, staff), Subject Access Request (SAR) Procedure, Complaints Policy (general)

Policy agreed:	July 2026
To be reviewed:	July 2027