



CROCKERTON CHURCH OF ENGLAND VA PRIMARY SCHOOL

VISION STATEMENT

Within the love of God, together we live, learn, care, and celebrate.
For each other and for ourselves, we aim for the best.

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Data Protection Complaints Policy and Procedure

This is a single policy which has been written on behalf of the Governing Body for Crockerton Church of England VA Primary School.

Written	January 2026
Reviewed	New Policy required under the DUAA
Author	School DPO & Governors
Next Review	As notified of updates

1 Policy Statement

- 1.1 Crockerton Primary School is committed to protecting the personal data of pupils, parents/carers, staff, and other individuals in accordance with the Data Protection Act 2018, UK GDPR, and the Data Use and Accountability Act (DUAA).
- 1.2 From **1 June 2026**, all schools are required to have a clear, accessible and robust **Data Protection Complaints Policy and Procedure**.
- 1.3 We aim to handle any concerns or complaints relating to personal data promptly, fairly, and transparently.

2 Purpose of this Policy

- 2.1 This policy:
 - Sets out how individuals can raise a complaint relating to data protection.
 - Defines how the school will respond, investigate, and resolve complaints.
 - Outlines rights of escalation, including to the Data Protection Officer (DPO) and the Information Commissioner's Office (ICO).
 - Supports the school's obligations under the DUAA to maintain clear accountability and transparency.

3 Scope

- 3.1 This policy covers complaints relating to:
 - The collection, use, storage, sharing or disposal of personal data.
 - Subject access requests or other data rights requests.
 - Alleged unlawful processing or improper handling of data.
 - Data breaches or concerns about data security.
 - Failure to follow statutory requirements or internal policies.

*Note: Complaints about **general school matters** are covered by the main School Complaints Policy.*

4 Definitions

- **Personal Data:** Any information relating to an identified or identifiable individual.
- **Data Subject:** The individual to whom the personal data relates.
- **Processing:** Any action involving personal data (collection, storage, use, deletion, sharing etc.).
- **DPO:** The Data Protection Officer responsible for overseeing compliance and advising the school.

5 Responsibilities

- **Headteacher:** Overall operational responsibility for complaint handling.
- **DPO:** Independent oversight, ensuring compliance, supporting investigations, and acting as an escalation point.
- **All Staff:** Required to report concerns immediately and cooperate with investigations.

6 How to Raise a Complaint

- 6.1 Complaints should be submitted using one of the following:
 - By email to: [Insert School Contact Email]
 - By post to: [Insert School Address], marked "Data Protection Complaint"
 - Directly to the DPO: dpo@jeremysatford.co.uk
- 6.2 Complainants should include:
 - Their name and contact details
 - Details of the issue
 - Relevant dates and supporting information
 - What outcome they are seeking

6.3 Anonymous complaints will be considered where sufficient detail allows investigation.

7 Timescales

- **Acknowledgement:** Within 5 school days
- **Full response:** Within 30 school days (may be extended for complex complaints; the complainant will be informed)

8 Investigation Process

8.1 The school will:

- Record the complaint
- Assess the nature and severity
- Establish the facts through proportionate investigation
- Consult with the DPO
- Provide a clear written outcome with reasons

8.2 Where a personal data breach is identified, the school will follow its Data Breach Procedure.

9 Possible Outcomes

- Confirmation that data was handled correctly
- Recommendations for improvement
- Corrective actions (e.g., updating records, revising processes)
- Formal apology
- Notification to affected individuals (if relevant)
- Notification to the ICO (if required)

10 Escalation Routes

10.1 If dissatisfied with the outcome, individuals may escalate to:

1. **The DPO** – Mr Jeremy Shatford dpo@jeremyshatford.co.uk
2. **Governing Body / Trust Board** – via the Clerk
3. **Information Commissioner's Office (ICO)**
Website: <https://ico.org.uk/>
Phone: 0303 123 1113

11 Monitoring and Review

- All complaints will be logged and monitored.
- An annual report will be provided to the governing body/trust board.
- This policy will be reviewed annually or upon relevant legislative changes.

Data Protection Complaints Procedure

(Operational workflow for staff—attach as an appendix to the policy)

1 Receiving a Complaint

- Complaint is received via email, post, in person, or via DPO.
- Staff must forward any complaint immediately to the Headteacher and DPO.

2 Logging the Complaint

- Record the complaint in the school's Data Protection Complaints Log.
- Note date received, complainant details, nature of complaint, and staff assigned.

3 Acknowledgement

- Acknowledge within 5 school days.
- Provide the expected timeline and named contact handling the complaint.

4 Initial Assessment

4.1 The Headteacher and/or DPO will:

- Determine if the complaint relates to personal data.
- Identify whether urgent action is required (e.g., if involving a potential data breach).
- Decide whether immediate containment or risk-mitigation steps are necessary.

5 Investigation Steps

- Review relevant data systems, records, and policies.
- Interview staff involved, if required.
- Consult technical teams (ICT provider) if systems or security issues are involved.
- Refer to existing school Data Protection Policies.

6 Determining an Outcome

6.1 The decision should:

- Address each element of the complaint.
- Confirm whether the school has complied with legislation and school policies.
- Detail corrective actions or improvements.

7 Communicating the Outcome

- Provide a written response within 30 school days (or explain any delay).
- Include: findings, decisions, actions taken, right of escalation, and contact details for the DPO and ICO.

8 Escalation Handling

8.1 If the complainant is unhappy:

1. The DPO reviews the case independently.
2. If still unresolved, the matter can be escalated to the governing body/trust board.
3. Final external escalation is to the ICO.

9 Recording and Learning

- All complaints and outcomes must be logged.
- Annual analysis of themes to inform improvements.
- Any systemic failings must be corrected, and staff retrained if necessary.

10 Retention

10.1 Complaint records must be retained according to the school's retention schedule and the principles in its Data Protection Policy