



# 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.

|                    |                                           |
|--------------------|-------------------------------------------|
| <b>Written</b>     | January 2026                              |
| <b>Reviewed</b>    | <b>New Policy required under the DUAA</b> |
| <b>Author</b>      | School DPO & Governors                    |
| <b>Next Review</b> | 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@jeremyshatford.co.uk](mailto:dpo@jeremyshatford.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