



2025- 2026



**Together we learn, together we
grow, together we flourish**

Data Protection Complaints Policy and Procedures

Christ Church CE Primary School



**'Some seeds fell on good earth and produced a
harvest beyond wildest dreams.'**

Matthew 13:8

Our School Vision

Life at Christ Church is underpinned by the Christian values of **community, respect and stewardship** which helps us to all:

Learn by;

- Feeling and being safe and happy in our school and its grounds
- Developing a love of learning
- Enjoying a rich, broad and balanced curriculum
- Challenging ourselves to be the best we can be
- Being supported to be mentally well
- Ensuring ethics, morals and values underpin school life
- Having a culture of high expectations and excellence.
- Welcoming parents and carers as partners in children's learning.
- Having a close relationship with our Church and strong links with our community.
- Taking pride in our grounds and learning environment.
- Learning from each other and sharing best practice.
- Developing the knowledge, skills and understanding needed to equip us for the next stage in life
- Understanding and learning how to be a good citizen.

Grow by;

- Understanding and celebrating diversity
- Developing our spiritual, moral and cultural awareness
- Improving and innovating through continual self-reflection
- Making the most of opportunities
- Taking pride in and celebrating our achievements and those of others

Flourish by;

- Getting involved in local, national and global issues
- Experiencing exciting and enjoyable wider experiences
- Becoming caretakers of the world.

Together we learn – Together we grow – Together we flourish

'Some seeds fell on good earth and produced a harvest beyond wildest dreams.'

Matthew 13:8

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Policy Statement

Christ Church CE VC 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).

From **1 June 2026**, all schools are required to have a clear, accessible and robust **Data Protection Complaints Policy and Procedure**.

We aim to handle any concerns or complaints relating to personal data promptly, fairly, and transparently.

Purpose of this Policy

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.

Scope

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.*

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.

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.

How to Raise a Complaint

Complaints should be submitted using one of the following:

- By email to: admin@christchurch.wilts.sch.uk
- By post to: Christ Church Primary School, Berryfield Road, Bradford on Avon, BA15 1ST, marked “Data Protection Complaint”
- Directly to the DPO: dpo@jeremysatford.co.uk

Complainants should include:

- Their name and contact details
- Details of the issue
- Relevant dates and supporting information
- What outcome they are seeking
-

Anonymous complaints will be considered where sufficient detail allows investigation.

Timescales

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

Investigation Process

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

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

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)

Escalation Routes

If dissatisfied with the outcome, individuals may escalate to:

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

Monitoring and Review

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

Data Protection Complaints Procedure

Receiving a Complaint

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

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.

Acknowledgement

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

Initial Assessment

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.

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.

Determining an Outcome

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.

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.

Escalation Handling

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.
3. Final external escalation is to the ICO.

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.

Retention

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

28th January 2026