# HOLYWELL CHURCH OF ENGLAND ACADEMY

## GDPR Complaints Policy

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| Author | MG Simpson |
| Responsibility | All staff and the governing body |
| Approved by Headteacher: | October 2026 |
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At Holywell, our vision is that everyone in our community chooses to "Live Life in all its Fullness" (John 10:10).

Inspired by the teaching of Jesus, the Good Shepherd, we choose …
to live our values,
being the best we can be
in community.

# Handling data protection complaints

The school will maintain a clear and accessible process for managing data protection complaints in line with legal requirements and good practice.

Data protection complaints will consist of any concern that personal data has been managed in breach of data protection law, e.g. rights requests, data security, collection, use, retention or accuracy of data.

Complainants will not be required to use legal terminology. Where unclear, the school will seek clarification. Complaints that relate primarily to service issues but include a data rights request will not automatically be treated as data protection complaints.

The school will provide accessible ways for individuals to submit complaints, e.g. email, form, telephone, post, in person, and will accept complaints made via any channel, including social media, while requesting a secure contact method where necessary.

The school will inform individuals of their right to complain at the point of data collection and within relevant responses, e.g. subject access requests, using clear and age-appropriate language.

## Initial handling and acknowledgement

The school will:

- Acknowledge receipt of a data protection complaint within 30 calendar days from the day after receipt.
- Make arrangements to meet this timescale during periods of staff absence.
- Confirm receipt and next steps using the complainant's preferred or original contact method where appropriate.
- Verify the identity of the complainant where necessary and request only proportionate evidence.
- Verify authority where a complaint is made on behalf of another individual before proceeding.

## Investigation

The school will:

- Begin investigating without undue delay.
- Make appropriate and proportionate enquiries, including reviewing records, speaking to relevant staff and assessing compliance with policies and law.
- Seek further information from the complainant where needed and clarify desired outcomes.
- Take into account the complexity, scale and potential harm when determining timescales.

- Keep the complainant informed of the investigation progress and any delays.

## Children and additional considerations

The school recognises that children have the same data protection rights as adults and will:

- Communicate in clear, age-appropriate language.
- Assess their understanding, where required.
- Provide mechanisms for children to raise concerns, including urgency indicators.
- Prioritise safeguarding concerns and act promptly where risk is indicated.

## Outcome

The school will:

- Provide a clear outcome without undue delay, explaining findings, decisions and any actions taken.
- Respond to each aspect of the complaint and provide supporting information where appropriate.
- Inform the complainant of their right to raise concerns with the ICO.
- Consider offering a review where appropriate, noting individuals may contact the ICO at any time.

## Record keeping and learning

The school will:

- Keep records of complaints, including receipt, acknowledgement, investigation, outcome and actions taken.
- Ensure records are accurate, organised and retained only as long as necessary.
- Monitor trends and use outcomes to improve practices and compliance.

## Responsibilities and governance

The school will:

- Ensure staff are trained to recognise and appropriately escalate data protection complaints.
- Integrate data protection complaints into existing complaints procedures where appropriate, ensuring no undue delay.
- Ensure appropriate arrangements are in place where acting as a joint controller or working with processors, with clear responsibilities for managing complaints.

## Regulatory context

The school will comply with its obligation to provide a complaints process, respond without undue delay, and acknowledge complaints within 30 days. Where a complainant contacts the ICO, the school will cooperate as required.

## Monitoring and review

This policy is reviewed bi-annually by the DPO and the headteacher.