



# Data Protection Complaints Policy

|              |        |                     |                |
|--------------|--------|---------------------|----------------|
| Approved by  | CEO    | Date Approved       | 30.09.26       |
| Review cycle | Annual | Date of next review | September 2027 |

| Version | Author                                  | Date     | Changes                    |
|---------|-----------------------------------------|----------|----------------------------|
| 1.0     | A. Morgan, Lead Governance Professional | 23.09.26 | New. Based on SCC template |
|         |                                         |          |                            |

## Contents

|                                                  |   |
|--------------------------------------------------|---|
| 1. Introduction .....                            | 1 |
| 2. Scope.....                                    | 1 |
| 3. Roles and Responsibilities.....               | 2 |
| 3.1 Data Controller .....                        | 2 |
| 3.2 Data Protection Officer (DPO) .....          | 2 |
| 4. Making a Complaint.....                       | 2 |
| Complaint process .....                          | 2 |
| 5. External Escalation.....                      | 3 |
| 6. Data Breaches .....                           | 3 |
| 7. Confidentiality.....                          | 3 |
| 8. Monitoring and Review .....                   | 3 |
| 9. Training and Awareness.....                   | 3 |
| 10. Related Policies .....                       | 3 |
| Appendix 1: Data Protection Complaint form ..... | 4 |

## 1. Introduction

Enlighten Learning Trust is committed to protecting the personal data of pupils, staff, parents, and all stakeholders.

This policy sets out how the trust and trust schools will respond to concerns and complaints relating to the processing of personal data, in compliance with:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Data (Use and Access) Act 2025
- Guidance from the Information Commissioner's Office (ICO)

The trust and trust schools aim to resolve complaints promptly, fairly, and transparently.

## 2. Scope

This policy applies to all individuals whose personal data is processed by the trust and trust schools, including:

- Pupils

- Parents and carers
- Staff (current and former)
- Governors / Trustees
- Visitors and third parties

It covers complaints relating to:

- Use or sharing of personal data
- Accuracy of information
- Data security
- Retention or deletion of data
- Responses to data rights requests including Subject Access Requests (SARs)
- CCTV and monitoring systems

### 3. Roles and Responsibilities

#### 3.1 Data Controller

The Trust is registered as a Data Controller with the Information Commissioner's Office (ICO). Our registration number is ZA243113.

#### 3.2 Data Protection Officer (DPO)

The DPO is Satswana Ltd, Suite G12, Ferneberga House, Alexandra House, Farnborough, GU14 6DQ

Email: [info@satswana.com](mailto:info@satswana.com)

Telephone number: 01252 759177

### 4. Making a Complaint

Complaints may be made:

- In writing (email or letter) or
- Via the Data Protection complaint form (Appendix 1)

If you require assistance, please contact the school office.

Complaints should be addressed to:

School complaints: the school Data Protection Manager and sent to the school office

Trust complaints: the Trust GDPR Manager on [lowen@enlightenIt.education](mailto:lowen@enlightenIt.education).

#### Complaint process

##### Acknowledgement

- Within 30 days

##### Investigation

The investigator will:

- Review relevant data and records
- Speak to staff involved
- Seek advice from the DPO

##### Response Timescale

- The full response will be provided without undue delay, typically within 60 days of receipt.

- Where the investigation is more complex, the complainant will be kept informed of any extension to the timescale.

### **Outcome**

The response will include:

- Findings of the investigation
- Explanation of decisions
- Details of any corrective action
- Information on escalation

### **5. External Escalation**

If the complainant remains dissatisfied, they have the right to contact the Information Commissioner's Office (ICO).

#### **ICO Contact Details:**

Website: <https://www.ico.org.uk>

Telephone: 0303 123 1113

### **6. Data Breaches**

If a complaint identifies a potential data breach, this will be managed in accordance with the trust's data breach procedure.

### **7. Confidentiality**

- All complaints will be handled confidentially
- Information will only be shared where necessary
- Records will be securely stored in line with retention schedules

### **8. Monitoring and Review**

- This policy will be reviewed annually
- Trends in complaints will be analysed. Findings will be reported to leadership and Governors/Trustees

### **9. Training and Awareness**

The school will ensure that:

- Staff receive appropriate data protection training
- Staff understand how to recognise and escalate complaints
- The DPO provides ongoing support and advice

### **10. Related Policies**

- Data Protection Policy
- Complaints Policy
- Records Retention Policy
- Privacy Notices

**Appendix 1: Data Protection Complaint form**

In accordance with the Data (Use and Access) Act 2025, individuals must raise data protection concerns directly with the school before escalating to the Information Commissioner's Office (ICO).

If you wish to raise a complaint, please complete this form and email it to school office/Trust GDPR Manager ([lowen@enlightenlt.education](mailto:lowen@enlightenlt.education)). We will acknowledge your complaint within 30 days and investigate without undue delay, usually within 60 days of receipt.

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Your name:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Relationship to school (eg parent, pupil, staff member):</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>Contact details:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Date:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>What is your concern regarding?</b><br>(Tick all that apply)<br><input type="checkbox"/> My personal data has been shared unlawfully.<br><input type="checkbox"/> The school holds inaccurate information about me/my child.<br><input type="checkbox"/> I am unhappy with the response to my Subject Access Request (SAR).<br><input type="checkbox"/> I am concerned about a potential data breach or loss of information.<br><input type="checkbox"/> I object to how my data is being used (e.g., by an AI tool or for marketing).<br><input type="checkbox"/> Other (Please specify): |
| <b>Details of the Issue</b><br>Please describe what happened, including relevant dates and any staff members involved.                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

**Desired outcome**

What would you like the school to do to resolve the matter? (e.g. an apology, correction of data, explanation of a decision).

**Identification (If required)**

To protect your privacy, we may need to verify your identity. If you are complaining on behalf of a child or another person, please confirm your authority to do so (e.g., Parental Responsibility). We may still ask for proof of identity.

☐ I confirm I am the data subject.

☐ I am acting on behalf of (Name) and have the legal right to do so.