



# Education Learning Trust Multi Academy Trust

## Data Protection Complaints Procedure

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| Last Update | Autumn 2026 |
| Next review | Autumn 2028 |

## Revision History

| Date           | Document Version | Document Revision History                        | Document Author / Reviser | Document Approver      |
|----------------|------------------|--------------------------------------------------|---------------------------|------------------------|
| October 2025   | 1.0              | New document                                     | M Keefe - DPO             | FARR                   |
| September 2026 | 1.1              | Revised in line with the Data Use and Access Act | M Keefe - DPO             | Trust Board 22/10/2026 |

## Data Protection Complaints Handling Procedure

### Purpose

To ensure all data protection complaints are handled promptly, fairly, and in compliance with the UK General Data Protection Regulation (UK GDPR), Data Protection Act 2018, and Data Use and Access Act 2025.

### Scope

This procedure applies to all Trust employees, school leaders, support staff and others who may receive or deal with a data protection complaint.

### Definitions

- **Data Subject:** Any individual whose personal data is processed by the company.
- **DPO:** Data Protection Officer.
- **ICO:** Information Commissioner's Office.

### Procedure Steps

#### 1. Receipt of Complaint

- Complaints may be received via the company website form, email, or in writing.
- All complaints must be forwarded immediately to the DPO and HR Department.

#### 2. Acknowledgement

- Acknowledge receipt within **3 working days** and in all cases no later than 30 days after receipt.
- Provide the complainant with a reference number and outline the next steps.

### **3. Initial Assessment**

- The DPO/HR reviews the complaint to confirm it relates to data protection.
- If not a data protection issue, inform the complainant and redirect as appropriate.

### **4. Investigation**

- The DPO leads the investigation, which may include:
  - Reviewing relevant data processing activities.
  - Interviewing staff involved.
  - Examining relevant records and systems.
- Maintain strict confidentiality throughout.

### **5. Response to Complainant**

- The Trust will investigate complaints without undue delay, make appropriate enquiries, keep the complainant informed of progress and notify the complainant of the outcome without undue delay. The Trust's operational aim is to provide a substantive response within 30 calendar days wherever reasonably possible.
- The response must include:
  - A summary of the investigation.
  - The outcome (e.g., whether a breach occurred).
  - Any corrective actions taken.
  - Information on the right to escalate to the ICO if unsatisfied.

### **6. Remediation**

- If a breach or failure is identified:
  - Take corrective action (e.g., correct/delete data, update processes, retrain staff).
  - Notify affected individuals and the ICO if required.

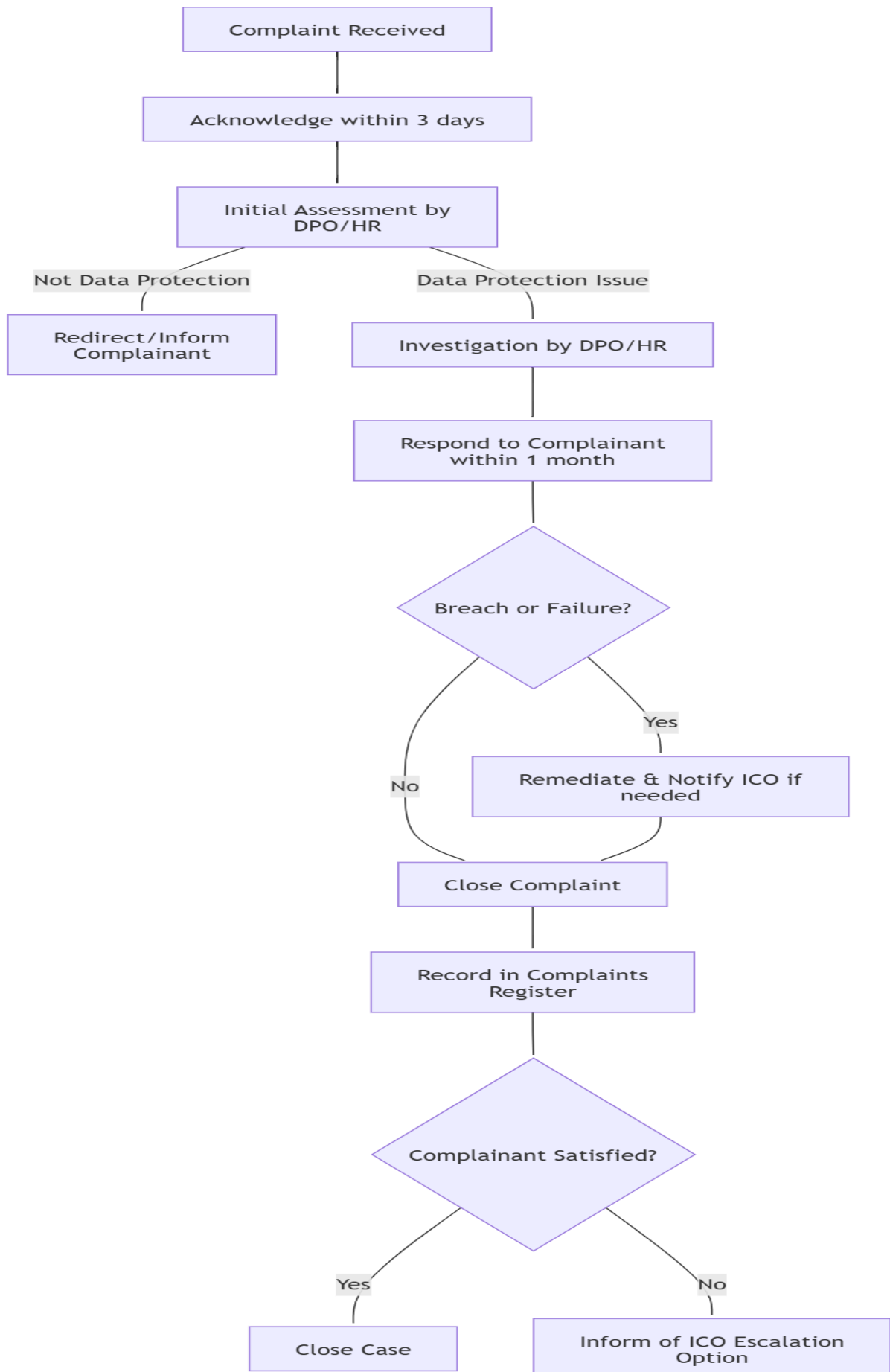
### **7. Record Keeping**

- Log all complaints, investigations, outcomes, and actions in the Data Protection Complaints Register.
- Records must be kept securely and only accessible to authorised personnel.
- Complaint records must include acknowledgement, enquiries made, evidence reviewed, outcome, remedial actions and key dates.

### **8. Escalation**

Where a complainant remains dissatisfied, they may request an internal review by an appropriate senior leader who was not involved in the original decision.

## Flowchart: Data Protection Complaints Handling



## **Roles and Responsibilities**

- **Managers:**
  - Forward any data protection complaints immediately to HR/DPO.
  - Cooperate fully with investigations.
  - Maintain confidentiality.
- **HR Department:**
  - Log and track all complaints.
  - Support the DPO in investigations and communications.
  - Ensure records are kept securely.
- **DPO:**
  - Lead the investigation and response process.
  - Advise on legal compliance.
  - Report breaches to the ICO if required.

## **Review and Training**

- This procedure should be reviewed annually or after any significant data protection incident.
- All managers and HR staff must receive training on this procedure.

**For questions or further guidance, contact the Data Protection Officer at [dpo@educationlearningtrust.com](mailto:dpo@educationlearningtrust.com)**

## **Template Communications**

### **Acknowledgement Email:**

Dear [Name],

Thank you for your data protection complaint, received on [date]. We take such matters seriously and will investigate promptly. Your reference number is [XXXX]. We will update you within one month.

Regards,

[HR/DPO Name]

### **Outcome Email:**

Dear [Name],

Following our investigation into your data protection complaint, we have found that [summary of findings]. [Describe any corrective actions taken].

If you are not satisfied with our response, you have the right to escalate your complaint to the Information Commissioner's Office (ICO): [www.ico.org.uk](http://www.ico.org.uk)

Regards,

[HR/DPO Name]