



Christ Centred, Child Centred, Catholic Educational Excellence

THE DIOCESE OF WESTMINSTER ACADEMY TRUST

DATA PROTECTION COMPLAINTS

AND INFORMATION RIGHTS PROCEDURE

This Data Protection Complaints and Information Rights Procedure has been approved and adopted by The Diocese of Westminster Academy Trust in July 2026 and will be reviewed in July 2029.

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1. PURPOSE

- 1.1 The Trust takes data protection concerns seriously and will consider complaints about the way personal data has been handled.
- 1.2 This procedure explains how the Trust and its schools will manage data protection complaints and concerns, including concerns linked to subject access requests, other information rights requests, personal data handling, retention, accuracy, security and alleged data breaches.
- 1.3 This procedure applies across the Trust and its schools and should be read alongside the Trust's Data Protection Policy, Privacy Notices, Subject Access Request process, Data Breach Response Procedure and wider complaints arrangements.

2. WHAT THIS PROCEDURE COVERS

- 2.1 This procedure covers concerns about the way the Trust or one of its schools has handled personal data or responded to an information rights request, including a subject access request.
- 2.2 It may include concerns about whether the correct process has been followed, whether the relevant statutory timescale has been met, or whether specific personal data has been missed, incorrectly disclosed, wrongly withheld or handled in a way that raises a genuine data protection concern.
- 2.3 This procedure is not intended to reopen wider school complaints, safeguarding concerns, behaviour matters, SEND issues, admissions, exclusions, HR matters, parental disputes or disagreements with Trust or school decisions simply because personal data is mentioned within those matters. Where a concern is mainly about another Trust or school process, the Trust or relevant school will decide the appropriate route for dealing with it. A concern will not automatically become a data protection complaint simply because personal data is referred to within a wider matter.

3. TRUST AND SCHOOL PROCEDURES

- 3.1 The Trust may manage data protection complaints and information rights requests centrally, through the relevant school, or through a combination of Trust and school staff, depending on the nature of the matter and the Trust's internal arrangements.
- 3.2 Where a request or complaint relates mainly to one school, the relevant school may lead on searches, collation of records and factual input, with Trust support where required. Where a request or complaint relates to central Trust records, Trust systems, Trust staff, multiple schools or cross-Trust issues, the Trust may coordinate the response centrally.



- 3.3 The Trust may require schools to provide information, carry out searches, explain local context or assist with redactions where this is needed to respond to a data protection complaint or information rights request. Schools should not create separate or parallel response processes for the same matter unless agreed through the Trust's internal data protection route.
- 3.4 For the purposes of this procedure, references to the Trust or school mean the Trust, the relevant school, or the internal lead responsible for handling the matter under the Trust's governance arrangements.

4. HOW TO RAISE A DATA PROTECTION COMPLAINT

- 4.1 Data protection complaints should be made in writing where possible and sent to:
dpo@dowat.co.uk
- 4.2 The complaint should explain:
- What the concern is.
 - Whose personal data is involved.
 - Which school, Trust function, request, incident or decision the complaint relates to.
 - What outcome is being sought.
 - Any specific information the person believes has been missed, mishandled or wrongly disclosed.
- 4.3 The Trust or relevant school may ask for clarification where the concern is unclear, where further information is needed, or where the complaint includes broad or general allegations that cannot reasonably be investigated without more detail.

5. COMPLAINTS LINKED TO ONGOING SUBJECT ACCESS REQUESTS OR INFORMATION RIGHTS REQUESTS

- 5.1 Where a subject access request or other information rights request is already being processed, the Trust or relevant school will normally complete that process before considering a complaint about the outcome.
- 5.2 This is because the Trust or relevant school cannot fairly assess whether information has been missed, withheld or handled incorrectly until the response has been completed and the requester has had the opportunity to review it.



- 5.3 The Trust or relevant school may still consider a genuine procedural concern during an ongoing request where appropriate, for example if the requester believes the request has not been acknowledged, unnecessary identification has been requested, or the request has been refused. However, complaints about the scope of searches, redactions, exemptions, missing information or dissatisfaction with the eventual disclosure will normally be considered after the response has been issued.
- 5.4 The Trust and its schools will not normally enter into repeated correspondence or debate while a Subject Access Request is still being processed. Relevant correspondence may be acknowledged and considered as part of the ongoing process where appropriate.

6. CLARIFICATION, CHANGES AND ADDITIONAL REQUESTS

- 6.1 Requesters may clarify the scope of a Subject Access Request where this is genuinely needed.
- 6.2 However, repeated changes, new requests, additional search terms, new date ranges, additional named individuals, further systems, additional schools, central Trust records, or additional categories of information may be treated as a new request. Where clarification is required, the statutory timescale may be paused until clarification is received.
- 6.3 If the requester significantly expands the request after it has already been logged and searches have begun, the Trust or relevant school may decide whether the new points can reasonably be included within the existing request or whether they should be dealt with separately.
- 6.4 Where the same requester submits more than one request relating to the same person, the same records, the same incident, the same school, the same Trust function, or substantially the same information, the Trust or relevant school may manage those requests together where it is reasonable to do so. The Trust and its schools will not normally duplicate searches or run parallel request processes for the same data, as this would be disproportionate and could create confusion or unnecessary delay.
- 6.5 If a further request is received while an existing request for the same or substantially similar information is still being processed, the Trust or relevant school may confirm that the further request will be considered as part of the existing request where appropriate. Alternatively, it may be treated as a separate request with its own timescale if it raises genuinely new issues or seeks different information.
- 6.6 The Trust and its schools will take a reasonable and proportionate approach, but requesters should not expect a live request to be repeatedly reworked, duplicated or restarted each time further correspondence is sent.



7. EXTENSIONS TO THE RESPONSE PERIOD

- 7.1 Where a request is complex, or where the requester has made a number of requests, the Trust or relevant school may extend the response period by up to a further two months, in line with UK GDPR.
- 7.2 The requester will be informed within the initial one-month period where an extension is being applied and will be given the reason for this.
- 7.3 The decision to apply an extension is made by the Trust or relevant school, based on the complexity, volume and circumstances of the request. Requesters do not need to agree to the extension for it to apply. Where the requester has been notified within the initial one-month period and the reason for the extension has been explained, the extended statutory timescale will apply. The use of a lawful extension is part of the subject access process and does not mean that the Trust or school has failed to comply with the request.

8. SEARCHES CARRIED OUT BY THE TRUST AND ITS SCHOOLS

- 8.1 The Trust or relevant school is responsible for deciding what searches are reasonable and proportionate.
- 8.2 In doing so, the Trust or relevant school may take into account:
- The wording and scope of the request
 - The information likely to be held
 - Whether information is held by the Trust centrally, by one school, or across more than one school
 - The systems used by the Trust and relevant school(s)
 - The age and location of the information
 - The burden of searching
 - Whether the search is likely to produce relevant personal data
 - The rights and freedoms of other individuals
 - Safeguarding, confidentiality and legal considerations
- 8.3 Requesters may suggest where they believe relevant information may be held. However, they cannot require the Trust or a school to search every system, device, email account, staff member, school, Trust archive or historic record unless this is reasonable and proportionate in the circumstances.
- 8.4 The Trust and its schools will not carry out broad, speculative or repeated searches where reasonable steps have already been taken to locate the personal data falling within the scope of the request.



9. REDACTIONS, EXEMPTIONS AND THIRD-PARTY INFORMATION

- 9.1 The Trust or relevant school may withhold or redact information where required or permitted by law.
- 9.2 This may include information that relates to other children, parents/carers, staff, safeguarding concerns, confidential records, legal advice, management information, ongoing investigations, Trust-level discussions, or information that would adversely affect the rights and freedoms of another person.
- 9.3 Exemptions and redactions will be considered on a case-by-case basis. The fact that information relates to the requester, or mentions the requester, does not automatically mean it can be disclosed in full.
- 9.4 In school and Trust settings, records may often contain mixed information about several people. This is particularly common in safeguarding records, behaviour records, complaints records, CPOMS-style records, emails, HR records, Trust/school correspondence and staff notes. The Trust and its schools must balance the requester's rights with the rights, safety and confidentiality of others.
- 9.5 Where information has been lawfully withheld or redacted, the Trust or relevant school is not required to release it simply because the requester disagrees with the decision or raises a complaint. A complaint or challenge may lead to a review of a specific redaction or withholding decision, but it will not automatically result in the information being disclosed.
- 9.6 Where a decision is reviewed and the Trust or relevant school remains satisfied that the original reason for withholding or redacting the information is sound, it may confirm that the original decision stands.

10. USE OF EXTERNAL ADVICE, TEMPLATE LETTERS OR AI-GENERATED CORRESPONDANCE

- 10.1 The Trust recognises that individuals may seek advice or use template letters, online tools or AI-generated wording when raising data protection concerns or making information rights requests. The Trust or relevant school will consider the substance of the correspondence, rather than the form in which it is drafted.
- 10.2 However, correspondence must still be clear, specific and manageable. The use of lengthy, repetitive or generic wording will not require the Trust or relevant school to expand the request beyond what has reasonably been asked for, repeat searches already completed, or respond separately to every legal assertion where the substance of the matter has already been addressed.
- 10.3 Where correspondence introduces new issues, new time periods, new search terms, additional individuals, additional schools, Trust-level systems or further categories of information, the Trust or relevant school may treat those points as a new request or may ask the requester to clarify what they are asking for.



- 10.4 The Trust or relevant school is responsible for deciding how to process a Subject Access Request lawfully and proportionately. Requesters may identify specific information they believe is held, but they cannot require the Trust or school to adopt a particular search method, search every possible location, disclose exempt information, or disregard the rights and freedoms of other individuals.
- 10.5 Where a requester repeatedly sends further correspondence before a response has been completed, the correspondence may be acknowledged and considered as part of the ongoing process where relevant. The Trust and its schools will not normally provide repeated interim responses or enter into ongoing debate while the request is still being processed.

11. COMPLAINTS AFTER A RESPONSE HAS BEEN ISSUED

- 11.1 If, after receiving the response, the requester believes that specific personal data has been missed or that the request has not been handled correctly, they should explain clearly what they believe is missing or incorrect.
- 11.2 Data protection complaints must be reasonable, specific and capable of being considered by the Trust or relevant school. Where a requester believes that a Subject Access Request or other information rights request has not been handled correctly, they should identify the specific information, document, search area, redaction or decision they are concerned about.
- 11.3 A complaint should not simply ask the Trust or school to repeat the whole process, carry out all searches again, reconsider every redaction, or provide a different outcome without explaining what specific issue needs to be reviewed.
- 11.4 The Trust or relevant school will consider specific and reasonable concerns. However, general dissatisfaction, disagreement with lawful redactions, or a belief that more information must exist will not automatically require searches to be repeated, the request to be reopened, or the process to be re-run.
- 11.5 Where the Trust or relevant school is satisfied that reasonable searches have already been carried out and the response has been properly handled, it may confirm that no further action will be taken.

12. TIMESCALE FOR RESPONDING TO DATA PROTECTION COMPLAINTS

- 12.1 The Trust or relevant school will respond to data protection complaints without undue delay and will aim to provide a response within one calendar month.



- 12.2 Where a matter is complex, where further enquiries are needed, where information must be obtained from one or more schools, or where the complaint overlaps with another Trust or school process, additional time may be required. The complainant will be kept informed where this is the case.

13. REPEATED, EXCESSIVE OR UNREASONABLE CORRESPONDANCE

- 13.1 The Trust and its schools will always consider genuine data protection concerns.
- 13.2 However, the Trust and its schools are not required to respond repeatedly to the same point where a clear response has already been provided. Repeated, excessive or unreasonable correspondence may be managed in line with the Trust's usual complaints or communications procedures.
- 13.3 Where correspondence becomes unreasonable in volume, frequency or tone, the Trust or relevant school may set appropriate communication boundaries while still ensuring that any valid information rights request is handled in line with data protection law.

14. ROLE OF THE EXTERNAL DATA PROTECTION OFFICER

- 14.1 The Trust has an internal contact route for data protection matters, normally through its Trust Data Protection Lead, dpo@dowat.co.uk, school-level Data Protection Leads, or other nominated internal contact route.
- 14.2 The External Data Protection Officer provides advice and support to the Trust and its schools. The External DPO is not the Trust's or school's complaint handler and does not correspond directly with parents, pupils, staff, requesters or complainants.
- 14.3 The Trust or relevant school may seek advice from its External Data Protection Officer when handling data protection complaints, Subject Access Requests or other information rights requests.
- 14.4 The External DPO may advise the Trust or relevant school on legal requirements, proportionality, timescales, searches, redactions, exemptions and complaint handling. The Trust or relevant school remains responsible for managing correspondence and for decisions about its own records and responses.

15. INFORMATION COMMISSIONER'S OFFICE

- 15.1 Individuals have the right to raise concerns with the Information Commissioner's Office.



- 15.2 The ICO will usually expect individuals to have raised the matter with the Trust or relevant school first and allowed a reasonable opportunity to respond.
- 15.3 The ICO can be contacted via its website: www.ico.org.uk.

16. REVIEW

- 16.1 This procedure should be reviewed periodically and updated where there are changes to data protection law, ICO guidance, Trust governance or internal processes.

