



DATA PROTECTION COMPLAINTS PROCEDURE

2026

Organisation	Redshift Education Ltd
Policy owner	Data Protection Officer
Approved by	CEO
Effective from	August 2026
Next review	June 2027

1. Purpose

Redshift Education Ltd (“Redshift”) is committed to handling personal information fairly, lawfully and securely.

This procedure explains how individuals can raise concerns or complaints about Redshift’s handling of their personal information and how those complaints will be managed.

It reflects the requirements of:

- the UK General Data Protection Regulation;
- the Data Protection Act 2018, including section 164A; and
- the Data (Use and Access) Act 2025.

This procedure applies across Redshift and all schools operated by Redshift.

2. Scope

This procedure applies to data protection complaints made by or on behalf of individuals whose personal information is processed by Redshift. This includes current and former:

- pupils;
- parents and guardians;
- employees, workers and contractors;
- job applicants;
- prospective families;
- website users; and
- other individuals whose personal information Redshift holds.

A data protection complaint may concern:

- how personal information has been collected or used;
- inappropriate or unauthorised disclosure;
- the accuracy of personal information;
- how long personal information has been retained;
- the security of personal information;
- Redshift’s handling of a personal data breach;
- Redshift’s response to a subject access request or another individual-rights request; or
- any other alleged failure to comply with data protection law.

The complainant does not need to refer to data protection legislation or describe the concern as a “data protection complaint” for this procedure to apply.

3. Relationship with other procedures

This procedure operates separately from Redshift’s and its schools’ general complaints, grievance, safeguarding and whistleblowing procedures.

Where a complaint includes both data protection and other issues:

- the data protection issues will be handled under this procedure;
- the remaining issues may be handled under the relevant separate procedure; and
- Redshift will coordinate the processes where appropriate.

Redshift will not delay responding to the data protection aspects of a complaint merely because other aspects remain under investigation.

A data protection complaint and an individual-rights request, such as a subject access request or request for erasure, are separate matters. Each will be handled under the applicable legal requirements and timescales.

If a complaint indicates a possible personal data breach or safeguarding concern, it will also be referred immediately for consideration under the relevant breach or safeguarding procedure.

4. How to make a complaint

A data protection complaint may be made:

- by email to dpo@redshifteducation.co.uk;
- through the relevant school office;
- by post to the relevant school or Redshift's registered office;
- verbally, including by telephone or in person; or
- through any other reasonable channel by which Redshift can be contacted.

Complaints received by a school or another Redshift employee must be passed to the Data Protection Officer without delay.

A particular form does not have to be used. However, it will help Redshift investigate the complaint if the complainant provides, where possible:

- their name and contact details;
- details of the individual whose personal information is concerned;
- a clear description of the concern;
- relevant dates, correspondence or reference numbers;
- copies of any relevant supporting documents; and
- the outcome they are seeking.

Redshift will provide reasonable assistance to anyone who needs help making a complaint, including children and individuals with accessibility or communication needs.

Complaints should not normally be submitted through social media because it may not be a secure way to provide personal information. If a complaint is received through social media, Redshift will ask the complainant for an appropriate alternative means of contact.

5. Complaints made on behalf of another person

A person may make a complaint on behalf of someone else, including through a solicitor, representative or advocate.

Redshift may request evidence that the representative is authorised to act for that individual. This may include a signed letter of authority or other appropriate evidence.

Where a parent or guardian makes a complaint concerning a child's personal information, Redshift will consider:

- the child's age and level of understanding;
- whether the child is able to exercise their own data protection rights;
- the nature of the complaint;
- the child's wishes, where appropriate; and
- whether the parent or guardian has authority to act on the child's behalf.

Redshift will not request identification or authority documents where it already has sufficient information to verify identity or authority.

6. Acknowledgement and initial assessment

Redshift aims to acknowledge data protection complaints within five working days and will always do so within the statutory period of 30 days beginning after the complaint is received.

The acknowledgement will normally:

- confirm receipt of the complaint;
- identify the person dealing with it;
- explain what will happen next;
- provide an indicative timeframe, where possible; and
- request any further information reasonably required.

The investigation begins when the complaint is received. Redshift will not wait until the end of the acknowledgement period before taking appropriate action.

Where there is doubt about the complainant's identity, Redshift may request proportionate evidence of identity. This will be requested as soon as reasonably possible and only where necessary.

Data protection complaints received during school holidays or periods of staff absence remain subject to this procedure and the applicable statutory requirements.

7. Investigation

The Data Protection Officer will coordinate the handling of the complaint and may obtain assistance from relevant schools, departments, employees, IT providers, professional advisers or data processors.

The investigation may include:

- reviewing relevant correspondence, records, systems and audit logs;
- speaking to relevant members of staff;
- comparing the complaint with the information held by Redshift;
- considering applicable policies, privacy notices and contractual arrangements;
- assessing compliance with data protection legislation; and
- identifying whether remedial action is required.

The investigation will be fair, proportionate and appropriate to the nature and seriousness of the complaint.

Where necessary, Redshift may ask the complainant to clarify the complaint or provide further relevant information. Redshift may also ask what outcome the complainant is seeking.

Redshift will take particular account of:

- any continuing risk or harm to the complainant;
- whether a child or vulnerable person is involved;
- the sensitivity of the personal information;
- the scale or seriousness of the issue; and
- whether immediate action is necessary.

The Data Protection Officer will provide independent data protection advice. The relevant member of senior management will be responsible for approving any operational or management action arising from the complaint.

If the complaint concerns the conduct of the Data Protection Officer, or there is another actual or potential conflict of interest, the Chief Executive Officer or another suitably senior person who has not previously been involved will appoint an alternative person to manage the complaint.

8. Timescales and progress updates

Redshift will investigate and respond to data protection complaints without undue delay.

The time required will depend on factors such as:

- the complexity and scope of the complaint;
- the volume of information involved;
- the need to obtain information from other parties; and
- any continuing risk or harm to the complainant.

Redshift aims to provide an outcome within one calendar month where reasonably possible.

If the investigation cannot be completed within that period, Redshift will inform the complainant, explain the reason for the delay and provide a revised indicative timeframe. Further updates will be provided where appropriate.

Any separate statutory timescale applying to an individual-rights request or personal data breach will continue to apply.

9. Outcome

Once the investigation is complete, Redshift will provide the complainant with an outcome without undue delay.

The response will normally:

- address the issues raised;
- summarise the enquiries made;
- explain the findings;
- confirm whether the complaint is upheld, partially upheld or not upheld;
- explain any action taken or proposed; and
- explain the complainant's further options.

Where appropriate, remedial action may include:

- correcting or deleting personal information;
- restricting further use of information;
- improving security or access controls;
- changing a policy, procedure or working practice;
- providing further staff guidance or training;
- taking appropriate management action;
- providing additional information or clarification; or
- apologising to the complainant.

Redshift may be unable to disclose confidential information concerning another individual, including details of any disciplinary or management action.

10. Further review and complaints to the ICO

If the complainant is dissatisfied with the outcome, they may ask Redshift to review or clarify its decision. Any review will, where reasonably possible, be conducted by a senior person who was not responsible for the original decision.

The complainant may also complain to the Information Commissioner's Office at any time. Redshift recommends allowing it an opportunity to investigate and respond first, where appropriate.

The Information Commissioner's Office can be contacted through:

- Website: <https://ico.org.uk/make-a-complaint/>
- Telephone: 0303 123 1113
- Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

11. Roles and responsibilities

All staff

All staff must:

- recognise possible data protection complaints;
- pass them to the Data Protection Officer without delay;
- preserve any relevant records or evidence;
- cooperate with investigations; and
- avoid making admissions, assurances or disclosures without appropriate authority.

School and departmental leaders

School and departmental leaders must:

- ensure complaints are escalated promptly;
- assist with investigations;
- ensure relevant records are preserved; and
- implement agreed remedial actions.

Data Protection Officer

The Data Protection Officer will:

- maintain oversight of the complaints process;
- ensure complaints are recorded and acknowledged;
- coordinate or advise on investigations;
- monitor applicable legal requirements and timescales;
- advise on appropriate outcomes and remedial action;
- identify recurring issues and compliance risks; and
- report significant matters to senior management and the Board where appropriate.

12. Record keeping and confidentiality

Redshift will maintain a secure record of:

- the date and method by which the complaint was received;
- the issues raised;
- the acknowledgement;
- relevant correspondence and evidence;
- enquiries made;
- findings and decisions;
- the outcome communicated to the complainant; and
- remedial actions and lessons learned.

Complaint information will be accessible only to those who need it for the investigation, decision-making, legal or regulatory purposes.

Records will be retained only for as long as necessary, having regard to Redshift's retention schedule, safeguarding obligations, applicable limitation periods and any legal or regulatory hold.

Complaint information will not be placed on a pupil's educational record or an employee's personnel record unless there is a clear and lawful reason to do so.

13. Monitoring and review

Redshift will review data protection complaints to identify:

- recurring issues or trends;
- gaps in policies, systems or training;
- outstanding remedial actions; and
- opportunities to improve its handling of personal information.

This procedure will be reviewed annually and following any material change in legislation, ICO guidance or Redshift's operations.

It should be published on Redshift and school websites and referenced in the relevant privacy notices.