

Data Protection Complaints Policy and Procedure

Version 1.0 May 2026

1. Purpose

This policy sets out how the Christ Church Abingdon will receive, acknowledge, investigate, and respond to complaints relating to its compliance with UK data-protection law. The procedure provides a clear, step-by-step operational process for receiving, triaging, investigating, and responding to data-protection complaints. It ensures alignment with the statutory requirements set out in the Data (Use and Access) Act 2025 and the UK GDPR.

2. Scope

This policy applies to all staff, volunteers, contractors, and anyone acting on behalf of Christ Church Abingdon. It covers complaints relating to any aspect of personal data processing under UK GDPR and the Data Protection Act 2018.

3. Definitions

Personal Data: Information relating to an identified or identifiable individual.

Data-Protection Complaint: Any expression of dissatisfaction alleging that the organisation has failed to comply with data-protection law.

Data Subject: The individual to whom the personal data relates.

ICO: The Information Commissioner's Office, the UK's data-protection regulator.

4. Policy Statement

Christ Church Abingdon is committed to handling all data-protection complaints fairly, transparently, and promptly. Individuals must be able to raise concerns easily, and the organisation must respond in line with statutory requirements.

5. What Counts as a Data-Protection Complaint

A data-protection complaint is any expression of dissatisfaction alleging that the organisation has failed to comply with data-protection law. Examples include concerns about:

- Data accuracy
- Data sharing or disclosure
- Security of personal data
- Delays or failures in responding to rights requests
- Data breaches
- Retention or deletion of data

Complaints may be made verbally or in writing, through any channel.

6. How Individuals Can Make a Complaint

Individuals may submit a data-protection complaint through any of the following channels:

- Email
- Telephone
- Written letter
- Online or paper form (where available)
- In person

No specific wording or format is required for a complaint to be valid.

7. Acknowledgement of Complaints

All data-protection complaints must be acknowledged within 30 days of receipt. The acknowledgement will confirm:

- That the complaint has been received
- The next steps in the investigation
- Expected timescales for response

8. Investigation Process

The organisation will investigate all complaints without undue delay. This includes:

- Reviewing relevant records and systems
- Consulting staff or volunteers involved in the processing activity
- Assessing whether data-protection law has been breached
- Taking remedial action where necessary

Complainants will be kept informed of progress where appropriate.

9. Responding to Complaints

A final response will be issued without undue delay. The response will:

- Summarise the complaint
- Outline the investigation steps taken
- Provide the organisation's findings
- Detail any corrective actions
- Explain the individual's right to escalate to the ICO

10. Escalation to the ICO

If an individual is dissatisfied with the organisation's response, they may raise their concern with the Information Commissioner's Office. Christ Church Abingdon will provide the ICO's contact details in the final response.

10. Record-Keeping

The organisation will maintain a secure record of:

- All complaints received
- Acknowledgements and correspondence
- Investigation notes
- Final outcomes

Records will be retained in accordance with Christ Church Abingdon's data retention policy.

11. Roles and Responsibilities

- Data Protection Officer (DPO): Oversees investigations, ensures compliance, and signs off on final responses.
- All Staff and Volunteers: Support fact-finding and implement corrective actions. Must recognise complaints, log them promptly, and forward them to the Data Protection Officer.

12. Review cycle

This Policy and the incorporated attachments will be reviewed by the PCC, as it is deemed appropriate, but no less frequently than every two years, and amended as necessary.

Data Protection Complaints Procedure

Step 1: Receive the Complaint

Complaints may arrive via email, phone, letter, online form, or in person. Staff must:

- Treat all expressions of dissatisfaction seriously
- Capture the complainant's contact details
- Record the date received
- Forward the complaint to the Data Protection Officer immediately

Step 2: Log the Complaint

The Data Protection Officer notifies the Incumbent and Church Wardens of the complaint made and logs the complaint in the secure complaints register, including:

- Complainant's name and contact details
- Summary of the issue
- Date received
- Staff member who received it
- Any immediate actions taken

Step 3: Acknowledge Within 30 Days

An acknowledgement must be sent within 30 days. It should include:

- Confirmation of receipt
- A brief outline of the next steps
- Expected timescales
- Contact details for further queries

Use the template: Acknowledgement Letter

Step 4: Investigate the Complaint

The Data Protection Officer will:

- Review relevant systems, records, and policies
- Speak with staff or volunteers involved
- Assess whether data-protection law has been breached
- Identify any corrective or preventative actions

The complainant should be updated if the investigation is likely to take longer than expected.

Step 5: Issue a Final Response

Once the outcome of the investigation has been reviewed and approved by the Incumbent and Church Wardens, the final response must be provided without undue delay. It should include:

- A summary of the complaint
- Steps taken during the investigation
- Findings and conclusions
- Any corrective actions taken
- Information on the right to escalate to the ICO

Use the template: Final Response Letter

Step 6: Close and Record Outcome

The Data Protection Officer updates the complaints register with:

- Date of final response
- Outcome summary
- Actions taken
- Whether the complaint was escalated

Records must be retained in line with Christ Church Abingdon's retention schedule.