



GODALMING LEARNING PARTNERSHIP



Godalming Junior School

General data use and access request Complaints Procedure

This guide explains how:

- members of the school community can raise concerns or complaints about how the school has managed their personal information or handled their Subject Access Request (SAR) under the UK GDPR and Data Protection Act 2018 and the Data (Use and Access) Act 2025.
- how members of the school community and the general public can raise concerns or complaints about how the school has managed their request for information under the Freedom of Information Act (2000) (FOI) or Environmental Information Regulations 2004 (EIR).

1. When to Use This Procedure

1.1. Use the procedure below if you have made a **Subject Access Request (SAR)** and:

- You have not received a response within **one calendar month**.
- You believe the SAR response is incomplete, inaccurate or you think information was wrongly withheld or redacted.

1.2. If you have made a request for data under the Freedom of Information Act (FOI) or Environmental Information Regulations (EIR) and:

- You have not received a response within **20 working days**.
- You believe the response is incomplete, inaccurate or you think information was wrongly withheld or redacted.

1.3. If you have a concern or complaint about how the school collects and processes personal data

2. How to Make a Complaint

Please contact the school using this [electronic form](#)

3. School Response

The school will aim to respond in full **within 30 calendar days** for general data protection or SARs complaints **and within 20 working days** for FOI and EIR complaints. If we need more time, we will let you know.

- 3.1. The review of your complaint will be dealt with in a fair and impartial manner. As such, the review will be undertaken by a panel of 2, made up of a senior member of staff and/or governor(s) who did not deal with your original request.
- 3.2. The panel will be supported by the Data Protection Officer to ensure correct understanding of Data Protection and FOI and EIR legislation.
- 3.3. The panel will make a fresh decision based on all available evidence at the date of your request. As part of this process, the panel may need to consult with the member of staff that provided the information originally.
- 3.4. The panel will make a decision about the validity of any exemptions applied, and whether the school has complied with its statutory duties.
- 3.5. The panel will inform you of the outcome of the review, giving a full explanation within the specified timescales.

4. Escalation

4.1. Step 1: Data Protection Officer

If your concern or complaint remains unresolved **after 31 days** for general data protection or SARs **and after 21 school days** for FOI and EIR complaints., contact our Data Protection Officer (DPO) Rachel Dunnage: DPO@godalminglearning.org.uk

4.2. Step 2: Information Commissioner's Office

If your concern has not been resolved by the Data Protection Officer after a further calendar month, you can complain to the Information Commissioner's Office (ICO) in the following ways:

- Personal information - [Make a complaint about how an organisation has used your personal information | ICO](#)
- Freedom of Information requests: [FOI and EIR complaints | ICO](#)

5. Timescales

- Complaint acknowledgment: **within 15 days.**
- Complaint internal investigation and response: **within 30 calendar days** for general data protection or SARs **and within 20 school days** for FOI and EIR complaints. There may be reasons we need to extend our investigation; if we need more time, we will let you know.
- Complaint escalation to DPO: **after 31 calendar days** for general data protection or SARs **and after 21 school days** for FOI and EIR complaints.

- Complaint escalation to ICO: **after two calendar months.**

6. Contact details:

- School: info@godalming-junior.surrey.sch.uk
- Data Protection Officer: Rachel Dunnage, DPO@godalminglearning.org.uk
- Information Commissioner Office: T: 0303 123 1113. For more ways to get in touch see: [How you can contact us | ICO](#)