



Data Protection Complaints Policy

1. Purpose

1.1 The purpose of this policy is to provide a clear, accessible procedure for individuals to raise concerns regarding Rainbow Trees Pathway's handling of personal data, and to ensure that such concerns are handled in strict accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and the Data (Use and Access) Act 2025.

1.2 This policy ensures that all data protection complaints are acknowledged promptly, investigated thoroughly without undue delay, and resolved transparently.

2. Scope

2.1 This policy applies to any individual whose personal data is processed by Rainbow Trees Pathway including but not limited to:

- Current and former employees, workers, contractors, and agency workers;
- Job applicants;
- Customers, clients, and service users;
- Suppliers and third-party contacts.

3. What is a Data Protection Complaint?

3.1 A data protection complaint is any expression of dissatisfaction, concern, or objection relating to the collection, use, storage, disclosure, retention, or other processing of personal data by Rainbow Trees Pathway.

3.2 Individuals do not need to use specific legal terminology or quote sections of data protection legislation for a concern to be treated as a valid complaint.

3.3 Examples of data protection complaints include concerns about:

- The way we have responded to a Subject Access Request (SAR) or other rights request;
- The security measures used to store personal information (e.g. following a data breach);
- How we have collected or used personal information (e.g. accuracy, retention periods, or sharing data);
- Monitoring activities or CCTV usage.

3.4 If an individual raises a general customer service complaint or an employee grievance that also includes a request to exercise data protection rights (e.g. asking for their data to be deleted), the data protection element will be handled in accordance with this policy, while the wider issue will be handled under the relevant grievance or complaints procedure.

4. How to Make a Complaint

4.1 Complaints can be made through any channel. However, to help us process complaints efficiently, we encourage individuals to direct their data protection complaints to our designated contact:

- Jemma Quarterman, Founder,
- Email: hello@rainbowtreespathway.co.uk
- Telephone: 01993 659025
- Postal Address: 116 Brize Norton Road, Minster Lovell, ox29 0sq

4.2 Complaints may be made in writing, by email, verbally over the phone, or in person. However a complaint is received, Rainbow Trees Pathway will accept and process it.

4.3 If a complaint is received via social media, we will ask the complainant to contact us via a secure alternative method (such as email) to protect their personal data during the investigation.

5. Complaints Made on Behalf of Others (and Children)

5.1 If a complaint is made on behalf of another person (e.g. by a family member, solicitor, or advocacy service), we must verify that the person making the complaint is authorised to act on the data subject's behalf. We will request appropriate evidence, such as a signed letter of authority or a Power of Attorney, before proceeding with the investigation.

5.2 Children have the same rights over their personal data as adults. If we receive a complaint from a child, we will respond in plain, clear language that they can understand, and we will assess their competence to understand and exercise their rights where necessary.

6. Acknowledgement and Timescales

6.1 We will acknowledge receipt of all data protection complaints within a maximum of 30 days of receiving them. Where possible, we aim to acknowledge complaints much sooner (e.g. within [3] working days).

6.2 The acknowledgement will confirm receipt, explain the next steps, and provide a point of contact for the investigation.

6.3 If we have any doubts about the identity of the person making the complaint, we will request proof of identity at the earliest opportunity to avoid delaying the investigation.

7. Investigation

7.1 Our obligation to investigate begins as soon as the complaint is received. We will take appropriate steps to investigate the complaint without undue delay.

7.2 The investigation may involve:

- Reviewing relevant records, systems, and communications;
- Speaking with the employees or managers involved;
- Examining our data protection policies and procedures;
- Seeking further clarification or information from the complainant.

7.3 We will keep the complainant updated on the progress of the investigation without undue delay.

8. Outcome and Response

8.1 Once the investigation is complete, we will inform the complainant of the outcome without unjustifiable or excessive delay.

8.2 The response will clearly explain what we have done to resolve the complaint, how we reached our conclusion, and whether the complaint has been upheld, partially upheld, or not upheld.

8.3 Where appropriate, remedial action may include:

- Correcting inaccurate information;
- Restricting or ceasing specific processing activities;
- Amending internal procedures or policies;
- Providing additional training to staff.

9. Escalation to the ICO

9.1 If the complainant remains dissatisfied with the outcome of our investigation, they have the right to complain directly to the Information Commissioner's Office (ICO).

9.2 The ICO can be contacted via their website at www.ico.org.uk or by calling their helpline on 0303 123 1113.

10. Record Keeping and Review

10.1 We will maintain a secure record of all data protection complaints received, including the date of receipt, the acknowledgement, relevant communications, the outcome, and any remedial actions taken.

10.2 Following the conclusion of a complaint, we will review the lessons learned to identify trends and improve our data protection practices.

Document Review Record

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Reviewed By (Job Title)	Head of Services
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