David Ross Education Trust

Broadening Horizons

Privacy Notice – Complaints

Document Management Information

Applicable to:	All staff in all Academies and Central Support Services including individuals employed by the Trust, contractors and agency staff. All Members and Trustees.
Dissemination:	This privacy notice will be available to staff via the Trust's Policy Centre and to complainants where appropriate.
Implementation:	Applicable to all DRET academies
Training:	On request
Review Frequency:	This privacy notice will be reviewed every three years, or earlier if required by changes in legislation, guidance, Trust policy or practice.
Policy Author:	George Selby, Head of Data Protection and Compliance
Executive Policy Owner:	Maria Maltby, Director of Governance
Approval by:	Executive Team
Approval Date:	19 October 2026
Next Review Due:	October 2029

Revision History

Document version	Description of Revision	Date Approved
V0.1	Version for Executive Team review	22 Oct 2020
1.0	Approved document	22 Oct 2020
1.1	Updated to reflect UK GDPR terminology, special category data, data sharing arrangements and current complaints governance wording.	19 October 2026

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1. Introduction

1.1. This privacy notice explains what personal information the David Ross Education Trust collects when it handles a complaint, why we need it, who we may share it with, how long we keep it and what rights individuals have.

1.2. In order for us to respond to your complaint, it is necessary for us to collect and process personal information about you and, where relevant, other individuals referred to in the complaint.

2. The Categories of Personal Data DRET Holds for Complaints

2.1. The David Ross Education Trust is the data controller for complaints and we have a legal obligation to process your personal information.

2.2. For the purposes of handling complaints we will collect and process the following information:

- Your name (if you provide it).
- Contact details you have supplied, including email address, contact telephone numbers or postal address.
- Your complaint.
- Any other personal data you provide as part of your complaint or that is reasonably necessary for us to investigate and respond to it.
- Where relevant, information about pupils, parents or carers, staff, trustees, governors, volunteers or other individuals involved in the complaint.
- Special category data, where this is relevant to the complaint, such as health information, SEND information, ethnicity, religion, safeguarding information or information about allegations of conduct.

3. Why DRET uses this Data

3.1. We process personal data so that we can acknowledge, investigate, respond to and learn from complaints in line with the Trust's Complaints Policy and legal obligations.

4. Our Lawful Basis for Using this Data

4.1. We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:

- Carry out an investigation into your complaint.
- Provide a response to a complaint and agree appropriate actions.
- Learn from the experience to inform changes in policy, practice and/or process.

4.2. Our main lawful basis for processing complaint information is Article 6(1)(e) of the UK GDPR: processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Trust. Where we need to process special category data, we will also identify an Article 9 condition and, where required, a condition under Schedule 1 of the Data Protection Act 2018.

5. Collecting Information

5.1. We collect this information from information you send directly to us.

6. How DRET Stores the Data

6.1. The data collected will be stored on the Trust's secure drive. We control access to systems and networks allowing us to stop people who are not allowed to view your personal information from getting access to it.

6.2. Your personal data will be kept in accordance with the timescales specified in the Trust's Records Retention Policy. Complaint records will not be kept for longer than is necessary for the purpose for which they were collected.

7. Data Sharing

7.1. Stage 1 Complaints: When you make a complaint, we may need to share some of the information you provide with relevant people within the Trust so that the complaint can be investigated and responded to. This may include the academy concerned, members of Central Support Services and an appointed investigating officer, such as a Trust-level manager or a senior member of staff within an academy.

7.2. Stage 2 and 3 Complaints: If you ask for a complaint to be escalated beyond Stage 1, we may need to share relevant complaint information with the person or panel appointed to consider the complaint under the Trust's Complaints Policy. This may include trustees, governors, independent panel members or senior Trust representatives, depending on the stage and nature of the complaint.

7.3. Where you have complained about a specific employee of the Trust we will usually share information you have provided about your complaint with that employee.

7.4. We may also share information with external organisations where this is necessary and lawful, for example with legal advisers, insurers, the Department for Education, safeguarding partners, the police, the Local Authority Designated Officer or the Information Commissioner's Office.

8. Transferring Data Internationally

8.1. Where we transfer personal data outside the United Kingdom, we will only do so where this is permitted under UK data protection law and appropriate safeguards are in place.

9. Your Rights

9.1. You have the right to:

- Ask for access to your personal information.
- Ask for rectification of the information we hold about you.
- Ask for the erasure of information about you.
- Data portability i.e. have your personal information transmitted electronically to another organisation in certain circumstances.
- Object to us processing your information.
- Ask us to restrict the processing of your information in certain circumstances.

9.2. These rights are not absolute and may depend on the lawful basis for processing and the circumstances of the complaint.

10. Complaints

10.1. We take any complaints about our collection and use of personal information very seriously. If

you think that our collection or use of personal information is unfair, misleading or inappropriate, or if you have any other concern about our data processing, please raise this with the Data Protection Officer in the first instance.

10.2. Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at https://ico.org.uk/concerns
- Call 0303 123 1113.
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

11. Contact Details

11.1. If you have any questions, concerns or would like more information about anything mentioned in this Privacy Notice, please contact our DPO, details below:

- George Selby, Data Protection Officer, David Ross Education Trust, dataprotection@dret.co.uk
- The postal address of the Trust is:

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  Thorpe Hill
  Loughborough
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