



Data Complaints Policy

Purpose	
The purpose of this policy is to ensure that Acorn Training handles all complaints relating to personal data in a consistent, fair, and timely manner, in compliance with applicable data protection legislation, including the UK GDPR, Data Protection Act 2018 and Data Use and Access Act 2025.	
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Privacy, Data, Personal, Processing, Complaint	
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Name of Owner:	Clare Hudson
Title of Owner:	Head of MIS (Data Protection Officer)
Name of Responsible Group:	Executive Management Team
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Target Audience:	All individuals whose personal data is held or processed by Acorn Training, including learners, staff, applicants, and third parties

Version Control

Version Number	Date	Comments (Description change and amendments)
1	27/05/2026	Policy adopted

Introduction

Acorn Training Ltd is committed to protecting your personal information and respecting your privacy, however we recognise that individuals may wish to raise issues or concerns regarding data protection.

This policy outlines how individuals can raise concerns about how their personal data is processed and how Acorn Training will respond

Definition of a Data Complaint

A data complaint is any expression of dissatisfaction regarding how Acorn Training collects, stores, processes, shares, or protects personal data. It can include concerns about:

- Accuracy of data
- Data handling or processing
- Data breaches
- Unauthorised disclosure
- Failure to comply with data protection rights

Roles and Responsibilities

All Staff

- Co-operate with any Data Complaint Investigations

Line Managers

- Co-operate with any Data Complaint Investigations
- Support in acting as Investigation Officer for Data Complaints, with support from Data Protection Officer where delegated

Data Protection Officer (DPO)

- Oversees all data complaints
- Acts as the default Investigating Officer
- Ensures compliance with data protection legislation

Investigating Officer

- Responsible for managing and investigating the complaint
- May be an alternative officer where there is a conflict of interest
- Ensures a fair, unbiased investigation is conducted

Complaint Procedure

Submission of a Complaint

Individuals may submit a data complaint via:

- Email
- Written correspondence
- Internal reporting mechanisms

The complaint should include sufficient details to allow investigation.

Acknowledgement

Upon receipt of a data complaint, Acorn Training will:

- Log the complaint using non-conformance reporting processes
- Allocate an Investigating Officer (typically the Data Protection Officer)
- Send written acknowledgement to the individual within 7 calendar days

Where a conflict of interest exists, an alternative Investigating Officer will be appointed.

Investigation Process

Acorn Training will ensure that a fair, impartial, and thorough investigation is conducted by:

- Requesting additional information from individuals and employees to support the investigation
- Speaking to individuals referenced in the complaint
- Liaising with external organisations where referenced
- Ensuring any breaches of data protection legislation or internal policies are identified

Data Breach

Where the complaint involves or identifies a potential data breach:

- A Data Breach Report will be completed
- The breach will be assessed in line with Acorn Training's Data Breach Policy
- Consideration will be given to whether the breach must be reported to:
 - The Information Commissioner's Office (ICO)

- Affected individuals
- Third Party Contractors and Funders (where relevant)

Outcome and Response

Acorn Training will:

- Conclude the investigation and determine the outcome
- Complete a Data Complaint Investigation Report outlining the investigation steps, evidence and outcome
- Communicate the findings clearly and in writing to the individual
- Provide reasons for decisions made
- Outline any corrective actions taken (if applicable)

The outcome will be communicated within 28 calendar days of receipt of the complaint.

Remedies and Actions

Depending on the findings, Acorn Training will:

- Rectify inaccurate data
- Restrict or cease processing activities
- Improve internal processes or controls
- Provide staff training
- Take disciplinary action if required
- Implement measures to prevent recurrence

Escalation

If the individual is dissatisfied with the outcome, individuals have the right to escalate their complaint to the Information Commissioner's Office (ICO). Contact details for the ICO will be provided in the response letter.

Record Keeping

Acorn Training will:

- Maintain a record of all data complaints received and outcomes through our non-conformance processes

Confidentiality

All complaints will be handled confidentially and in accordance with data protection principles. Information will only be shared where necessary for the investigation.

Linked Documents and Policies

- Data Protection Policy
- Records Management Policy
- Information Security Policy
- Data Breach Response Policy
- Data Complaint Investigation Report