

St. Anne's College Grammar School (SACGS)

Data Protection Complaints Procedure

Version 1.0 – June 2026

1. Purpose

St. Annes College Grammar School (SACGS) is committed to protecting the privacy rights of pupils, parents, staff, governors, volunteers and visitors.

This procedure explains how concerns and complaints relating to the processing of personal data will be managed in accordance with:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Independent School Standards
- Information Commissioner's Office (ICO) Guidance
- Data (Use and Access) Act 2025 requirements effective June 2026

The school aims to resolve concerns quickly, fairly and transparently.

2. Scope

This procedure applies to complaints relating to:

- Personal data held by the school
- Accuracy of information
- Access to personal information
- Sharing of personal information
- Data breaches
- Retention of records
- CCTV data
- Photographs and media use
- Subject Access Requests
- Consent issues
- Any other processing of personal data

This procedure does not replace the school's safeguarding procedures, staff grievance procedures, whistleblowing procedures or complaints policy where those are more appropriate.

3. Making a Complaint

Complaints should be submitted in writing wherever possible.

Complaints may be made by:

- Pupils
- Parents/carers
- Former pupils
- Staff
- Job applicants
- Visitors
- Third parties affected by the school's processing of personal information

Complaints should include:

- Name and contact details
- Description of the concern
- Relevant dates
- Any supporting evidence
- Desired outcome

Complaints should be sent to:

Data Protection Lead

Ms Martyn-Clark

St. Annes College Grammar School

4. Informal Resolution

Where appropriate, the school will seek to resolve concerns informally before commencing a formal investigation.

This may involve:

- Providing clarification
- Correcting inaccurate records
- Explaining school procedures
- Offering an apology where appropriate
- Taking immediate remedial action

Many concerns can be resolved quickly at this stage.

5. Formal Complaint Procedure

Stage 1 – Receipt

The Data Protection Lead will:

- Record the complaint in the Data Protection Complaints Log.
- Acknowledge receipt within **30 calendar days**.
- Confirm the issues being investigated.
- Explain the anticipated timescale.

Stage 2 – Investigation

The Data Protection Lead may:

- Review relevant records.
- Interview staff.
- Obtain written statements.
- Review systems and security measures.
- Seek legal or specialist advice if necessary.

The investigation will be conducted fairly, objectively and confidentially.

Stage 3 – Outcome

The complainant will receive a written response including:

- Findings of the investigation.
- Whether the complaint is upheld, partially upheld or not upheld.
- Any actions taken.
- Any corrective measures implemented.
- Information about escalation rights.

The school will aim to provide an outcome without undue delay.

Complex cases may require additional time.

6. Possible Outcomes

Following investigation, the school may:

- Correct inaccurate information.
 - Delete information where appropriate.
 - Restrict processing.
 - Improve procedures.
 - Provide additional staff training.
 - Amend policies.
 - Issue an apology.
 - Take disciplinary action where appropriate.
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7. Data Breach Complaints

Where a complaint relates to a potential data breach, the school will also follow its Data Breach Procedure.

This may include:

- Risk assessment.
 - Investigation.
 - Containment measures.
 - Notification to affected individuals.
 - Notification to the Information Commissioner's Office where legally required.
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8. Escalation

If the complainant remains dissatisfied, they may contact:

Information Commissioner's Office (ICO)

Information Commissioner's Office (ICO)

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Telephone: 0303 123 1113

The ICO recommends individuals give organisations an opportunity to resolve concerns before contacting them.

9. Monitoring and Governance

The Data Protection Lead will maintain a:

Data Protection Complaints Log

The log will record:

- Reference number
- Date received
- Complainant
- Nature of complaint
- Outcome
- Date closed
- Any lessons learned

Complaints will be reviewed annually by the Proprietor and Senior Leadership Team to identify trends and areas for improvement.

10. Confidentiality

Information relating to a complaint will only be shared with those who need access in order to investigate and resolve the matter.

Records will be retained in accordance with the school's retention schedule.

11. Links to Other Policies

This procedure should be read alongside:

- Data Protection Policy
 - Privacy Notice
 - Subject Access Request Procedure
 - Complaints Policy
 - CCTV Policy
 - Records Retention Schedule
 - Safeguarding Policy
 - Staff Code of Conduct
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Appendix A – Data Protection Complaint Form

Name:

Address:

Email:

Telephone Number:

Date of Complaint:

Please describe your concern:

What outcome are you seeking?

Supporting documents attached? Yes / No

Signature:

Date:

Approved by: Proprietor

Review Date: June 2027

Version: v1.0 (June 2026)

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