

POLICY

Title: Data Protection Complaints

Policy Holder: Executive Manager

Approval Board: College Leadership Team

Version No: v1.0

Last reviewed¹: September 2026

Review Period: 24 Months

Summary: This policy sets out a dedicated mechanism for data protection complaints in accordance with UK GDPR, the Data Protection Act 2018 and the Data (Use and Access) Act 2025.

Accessibility: If you would like this information in an alternative format, e.g. Easy to Read, large print, Braille or audio tape, or if you would like the procedure explained to you in your language, please contact the College's marketing team on 01603 773 169.

Further information: If you have any queries about this policy or procedure, please contact the Information Compliance Team data_protection@ccn.ac.uk



¹ The Review Period refers to our internal policy review process. The published policy is current and is the most recent approved version

Version Control Document			
Date	Version No.	Reason for Change	Author
Aug 2026	v 1.0	Document Creation	P.Beacock

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1. Policy Statement

City College Norwich (CCN) is committed to protecting personal information and ensuring concerns regarding the processing of personal data are handled fairly, transparently and effectively. This policy operates independently of the College complaints policy.

2. Aims & Objectives

The aim of this policy is to provide a clear and accessible process for individuals to raise concerns about the College's handling of personal data. It supports compliance with the UK GDPR, the Data Protection Act 2018 and the Data (Use and Access) Act 2025, ensuring that data protection complaints are managed fairly, consistently and in a timely manner.

The objectives of this policy are to:

- Provide a dedicated mechanism for raising data protection complaints.
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- Ensure data protection complaints are investigated and resolved in accordance with relevant legislation.
- Promote transparency, accountability and good data protection practice and support the continuous improvement of the College's management and protection of personal data.

3. Definition

A Data Protection Complaint is any expression of dissatisfaction or concern regarding the collection, use, storage, sharing, retention, disposal or security of personal data by the College. This may include concerns about the accuracy of personal data, how personal data has been processed, an individual's data protection rights, or an actual or suspected breach of data protection legislation. Complaints may be raised by data subjects or their authorised representatives and will be considered under this policy where they relate to the College's compliance with applicable data protection laws.

4. Scope

This policy applies to all individuals whose personal data is processed by the College, including students, staff, applicants, governors, contractors, parents, visitors, and other individuals who interact with the College. It covers complaints relating to the College's collection, use, storage, sharing, retention, disposal and protection of personal data, regardless of the format in which that information is held. The policy applies wherever the College is acting as a data controller or processor and processing personal data in the course of its activities.

5. Exclusions

This policy applies only to complaints that relate specifically to the handling of personal data and compliance with data protection legislation. The following matters are outside the scope of this policy and will be managed through the relevant College procedures:

Academic appeals: relating to assessment decisions, academic judgement, progression, awards, or other academic outcomes.

Disciplinary matters: concerning allegations of misconduct, breaches of conduct regulations, or

disciplinary investigations involving students, staff, or other individuals.

Grievances: raised by staff, students, or other stakeholders regarding employment issues, working relationships, service provision, or other matters not directly related to data protection compliance.

Non-data protection complaints: including complaints about the quality of services, operational decisions, customer service, facilities, or other issues where the handling of personal data is not the primary concern.

Where a complaint contains both data protection and non-data protection elements, the data protection aspects will be considered under this policy, while other aspects may be referred to the appropriate procedure for investigation and resolution.

6. Submitting a Complaint

Complaints may be submitted by email, post, telephone or in person to the Data Protection Officer (DPO) or the Information Compliance Team (Contact details are provided at Section 13). Complainants should provide sufficient information to enable the College to understand and investigate the concern, including details of the issue, any relevant dates, and supporting evidence where available.

Complaints can be submitted by the individual concerned or by an authorised representative acting on their behalf. The College is committed to making the complaints process accessible and will provide reasonable assistance to individuals who require support in submitting a complaint.

Where a complaint is made on behalf of an individual, the College may request evidence that the representative is authorised to act on their behalf, such as a signed letter of authority or other appropriate documentation. The College may also take reasonable steps to verify the identity of the parties involved before investigating the complaint.

Upon receipt, complaints will be acknowledged and managed in accordance with this policy, with the aim of resolving concerns fairly, promptly and transparently. Information will be handled confidentially and shared only where necessary.

7. Information Required

When submitting a data protection complaint, individuals should provide sufficient information to enable the College to understand and investigate the matter effectively. This should include:

- The complainant's name and contact details.
- A clear description of the concern or issue being raised.
- Relevant dates, times and locations, where applicable.
- Details of any College department, service or staff member involved.
- Copies of any supporting evidence or correspondence, where available.

Providing complete and accurate information will help ensure that the complaint can be investigated promptly and thoroughly. Where additional information is required, the College may contact the complainant to seek clarification before proceeding with the investigation.

8. Complaint Handling

All data protection complaints will be acknowledged within 30 calendar days of receipt and will be investigated without undue delay. The College will assess the nature and complexity of the complaint and may contact the complainant if further information or clarification is required to support the investigation.

Complaints will be handled fairly, impartially and confidentially by appropriately authorised staff. The College will keep the complainant informed of progress where appropriate and will aim to provide a response as soon as reasonably practicable. Where an investigation is expected to take longer than anticipated, the complainant will be advised of the reason for the delay and provided with an update on the status of their complaint.

Following completion of the investigation, the complainant will be informed of the outcome, including any actions taken or recommendations made where appropriate. The College will also use information from complaints to identify opportunities to improve its data protection practices and processes.

9. Unfounded Complaints

The College is committed to investigating all data protection complaints fairly, objectively and in accordance with this policy. However, where a complaint is considered to be abusive, vexatious, repetitive, or manifestly unfounded, the College may take appropriate steps to manage the matter proportionately.

A complaint may be considered repetitive where the same issues continue to be raised without any new evidence or material information. A complaint may be considered manifestly unfounded where there is no reasonable basis for the concern, or where there is evidence that the complaint is intended to cause disruption, inconvenience or undue burden.

In such circumstances, the College may refuse to take further action on the complaint or may limit further correspondence where it is reasonable and proportionate to do so. Any decision to do so will be made on a case-by-case basis, taking into account the specific circumstances of the complaint and the College's obligations under applicable data protection legislation.

Where appropriate, the complainant will be informed of the reasons for the decision and advised of any alternative routes available to them should they remain dissatisfied.

10. ICO Escalation

If an individual remains dissatisfied with the outcome of their complaint, or the way in which the College has handled it, they have the right to raise their concerns with the Information Commissioner's Office (ICO), the UK's independent authority responsible for upholding information rights and data protection laws.

The College encourages individuals to raise concerns with the College in the first instance to allow an opportunity for the matter to be reviewed and resolved. However, individuals may contact the ICO at any stage if they believe their personal data has been processed unlawfully or that their data protection rights have not been upheld.

Information about how to make a complaint to the ICO, including contact details and guidance on the complaints process, is available on the ICO's website: www.ico.org.uk

11. Records

The College will maintain a record of all data protection complaints, including the complaint details, investigation undertaken, outcome and any actions taken. Records will be held securely, accessed only by authorised personnel, and retained in accordance with the College's Records Retention Schedule and relevant data protection requirements. Complaint records may also be used to identify trends, support service improvements and demonstrate compliance with the College's data protection obligations.

12. Responsibilities

Governors provide oversight of the College's data protection arrangements. Senior managers are responsible for ensuring this policy is implemented effectively and that appropriate resources are available. The Data Protection Officer (DPO) oversees the management of data protection complaints, provides advice, and monitors compliance with relevant legislation. The Information Compliance Team supports complaint investigations and record keeping. All staff are responsible for complying with data protection requirements and cooperating with the investigation and resolution of complaints.

13. Contact

Information Compliance Team / Data Protection Officer

Telephone: 01603 773585 / 3176

Email: data.protection@ccn.ac.uk

Address: Thetford Building

City College Norwich, Ipswich Road

Norwich

NR2 2LJ

14. Equal Opportunities Statement

This policy has been assessed against the nine protected characteristics outlined in the Equality Act 2010 and no apparent disadvantage to equal opportunities has been determined.

If you have any comments or suggestions in relation to equal opportunities of this policy or procedure please contact the policy holder.