

# Data Protection Complaints Policy

*Issued under the Data (Use & Access) Act 2025*

| Version | Effective Date | Review Date  | Owner                                     |
|---------|----------------|--------------|-------------------------------------------|
| 1.0     | 19 June 2026   | 19 June 2027 | Head of Operations & Data Protection Lead |

## 1. Purpose

This policy sets out our formal process for handling complaints relating to the processing of personal data. It has been established to meet the requirements introduced under the Data (Use & Access) Act 2025, which amends the UK GDPR to require all organisations to have a documented data protection complaints handling process in place.

At ISCAS, we are committed to handling all data protection complaints effectively, fairly, and transparently, in a manner that respects individuals' rights and supports a culture of accountability.

## 2. Scope

This policy applies to all staff, contractors, and third parties acting on behalf of ISCAS. It covers any complaint received from an individual (a "complainant") who believes their personal data has been processed unlawfully, incorrectly, or in a manner inconsistent with their rights under UK data protection law.

## 3. How to Submit a Complaint

Individuals may submit a data protection complaint by any of the following methods:

- **Online Form**
- **Email:** [dpl@cedr.com](mailto:dpl@cedr.com)
- **In writing:** Addressed to the Head of Operations & Data Protection Lead, ISCAS, 100 St Paul's Churchyard, London, EC4M 8BU.
- **Verbally:** To any member of staff, who must record and escalate the complaint without delay

*Complainants are not required to use any particular method. A complaint submitted verbally or in writing to any employee will be treated as valid and must be passed to the appropriate team promptly.*

## 4. Identity Verification

Before investigating a complaint, we will take proportionate steps to verify the identity of the complainant. Where a complaint is submitted on behalf of another individual, we will also verify that appropriate authority exists, such as a power of attorney or written authorisation.



## **5. Acknowledgement**

All complaints will be acknowledged within 30 calendar days of receipt. The acknowledgement will confirm:

- That the complaint has been received and is being reviewed
- The name or team responsible for handling it
- An indication of the next steps and expected timescales

## **6. Investigation**

Complaints will be investigated without undue delay. The investigation will be proportionate to the nature and complexity of the complaint and may include:

- Speaking with staff members involved in the matter
- Reviewing internal records and comparing them with the complainant's account
- Checking compliance with relevant internal policies, procedures, and privacy notices

All investigative steps will be documented to support accountability and, where necessary, regulatory scrutiny.

## **7. Keeping Complainants Informed**

Throughout the investigation, we will keep the complainant reasonably informed of progress. If there are delays, we will communicate the reason and provide a revised timescale.

## **8. Outcome**

Once the investigation is complete, we will communicate the outcome to the complainant promptly and in clear language. The outcome communication will include:

- A summary of the investigation findings
- Any action taken or proposed as a result of the complaint
- Information about further escalation options, including the right to raise the matter with the ICO

## **9. Record Keeping**

We will maintain clear records of all data protection complaints received, including:

- Date of receipt and method of submission
- Details of the complaint raised
- Steps taken during the investigation
- The outcome and date of communication to the complainant

Records will be retained in line with our data retention policy and may be used to identify systemic issues and inform ongoing improvements to our data protection practices.

## **10. Escalation to the ICO**

If a complainant is not satisfied with the outcome of our internal complaints process, they have the right to escalate their complaint to the Information Commissioner's Office (ICO).

Information Commissioner's Office (ICO)  
Website: [www.ico.org.uk](http://www.ico.org.uk)  
Helpline: 0303 123 1113  
Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

## **11. Staff Responsibilities**

All staff must:

- Recognise when a concern raised by an individual may constitute a data protection complaint
- Pass any such complaint to the Head of Operations, who is the Data Protection Lead for ISCAS, promptly and without attempting informal resolution
- Not disclose details of a complaint to unauthorised parties

## **12. Policy Owner and Review**

This policy is owned by the Head of Operations & Data Protection Lead and will be reviewed annually or following any significant regulatory change, whichever is sooner.