

# Data Protection Complaint Procedure

## June 2026



Registered in England & Wales - Cognita Schools Limited No. 02313425  
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**COGNITA**

THRIVE IN A RAPIDLY EVOLVING WORLD

### 1. Purpose and scope

1.1 This procedure sets out how Cognita and its schools handle complaints relating to the processing of personal data, ensuring compliance with:

- UK GDPR;
- Data Protection Act 2018 (including Section 164A);
- Relevant Information Commissioner's Office ("ICO") guidance; and
- Relevant Independent School Standards coming into force June 2026.

This procedure **operates separately from the general complaint procedure.**

1.2 This procedure applies to complaints from any individual, including, but not limited to:

- Parents
- Pupils
- Employees
- Applicants
- Website users or other third parties

Either in a current or former capacity.

1.3 It covers complaints relating to personal data, specifically:

- Use or disclosure
- Accuracy
- Retention or deletion
- Data Subject Access Requests ("DSARs") and other data rights
- Alleged breaches of the UK GDPR or Data Protection Act 2018

1.4 This process is designed to be accessible and easy to use.

### 2. Relationship with General Complaint Procedure

2.1 Data protection complaints must not be handled under the General Complaint Procedure.

2.2 Where a complaint includes both general and data protection issues:

- The matters will be split and handled separately
- The data protection elements will be referred to the Data Protection Office ("DPO")

2.3 The DPO is responsible for:

- Managing and investigating complaints
- Ensuring compliance with statutory timeframes

- Meeting legal obligations
- Escalation where required

2.4 Schools must:

- Promptly escalate any data protection complaint to the DPO
- Cooperate fully with investigations

### 3. How to make a complaint

3.1 Complaints will be accepted through any reasonable means (verbal, email, or in writing) and may be submitted:

- By email: [DPO@cognita.com](mailto:DPO@cognita.com)
- Via school reception or administration (who must escalate immediately to [DPO@cognita.com](mailto:DPO@cognita.com))

3.2 Complaints do not need to be in a particular format or use legal terminology. However, to assist efficient processing of the complaint, it should include (where possible):

- Name and contact details
- Description of the issue
- Relevant dates
- Any supporting documentation

### 4. Initial Handling and Acknowledgement

4.1 All complaints must be logged upon receipt by DPO.

4.2 The complainant will receive an acknowledgement **within five (5) working days** of DPO receiving the complaint (and no later than 30 days as required by law).

4.3 The acknowledgement will:

- Confirm receipt
- Outline next steps
- Provide indicative timelines

### 5. Investigation

5.1 The DPO/Legal team will:

1. Assess the nature of the complaint;
2. Gather relevant information (including from the relevant school or department);
3. Identify any legal or regulatory issues; and
4. Determine whether:
  - A breach has occurred
  - Remedial action is required which may include, where appropriate: rectification, restriction or deletion of personal data; improvements to systems, processes or policies; staff training or disciplinary action; provision of information or apologies to the complainant; and any other steps necessary to mitigate risk, ensure compliance, and prevent recurrence.

5.2 Where appropriate, the investigation may include:

- Reviewing systems and records;
- Interviewing staff; and/or
- Assessing compliance with policies.

### 6. Timeframes

6.1 Complaints will be responded to **without undue delay**.

6.2 Where linked to data subject rights (e.g. DSARs), statutory deadlines under UK GDPR will apply (typically **one calendar month**).

6.3 Complainants will be kept informed of progress where appropriate.

6.4 If additional time is required:

- The complainant will be informed
- Reasons for delay will be explained

### 7. Outcome and response

7.1 The final response will:

- Address each issue raised
- Explain findings clearly
- Set out any actions taken, including:
  - Rectification or deletion of data
  - Changes to procedures
  - Staff training or disciplinary measures (if relevant)

### 8. Escalation rights

8.1 If the complainant is not satisfied, they will be informed of their right to:

- Escalate internally (if applicable), and/or
- Lodge a complaint with the ICO

### 9. Recordkeeping

9.1 Cognita will:

- Maintain a record of all complaints, investigations, and outcomes
- Retain records in accordance with the retention policy
- Ensure auditability for regulatory purposes

### 10. Relationship with Data Breach Procedures

10.1 If a complaint identifies a potential personal data breach:

- It will be assessed under Cognita's data breach reporting process
- The ICO will be notified where legally required

## **11. Publication**

11.1 This procedure will be published on school websites and referenced in privacy notices.

### Version control:

Ownership and consultation	
Document Sponsor	Head of Legal
Document Author / Reviewer	Legal and Data Protection Office
Consultation & Specialist Advice	
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