

St Austell Golf Club

Data Protection Complaints Procedure

1. Purpose

This procedure sets out how St Austell Golf Club (“the organisation”) receives, manages, investigates and resolves data protection complaints in accordance with the Data (Use and Access) Act 2025 and ICO guidance.

The organisation is committed to handling complaints fairly, transparently and without undue delay.

2. Scope

This procedure applies to:

- All data protection complaints relating to personal data processed by St Austell Golf Club
- Complaints raised by clients, customers, suppliers, or any individual (“data subjects”)
- All staff and associates responsible for handling personal data

A data protection complaint may relate to how personal data has been:

- Collected, used or shared
- Stored or retained
- Secured
- Responded to (e.g. subject access requests)

3. Legal Requirements

In line with UK data protection law, the organisation will:

- Provide a clear and accessible way for individuals to raise complaints
- Acknowledge receipt of complaints within 30 days
- Take appropriate steps to investigate complaints without undue delay and keep individuals informed
- Communicate the outcome of complaints without undue delay

4. How Complaints Can be Raised

Individuals may raise a data protection complaint through any of the following channels:

- Email: manager@staustellgolf.co.uk
- Telephone: 01726 74756
- In writing: St Austell Golf Club, Tregongeeves Lane St Austell Cornwall PL26 7DS
- Directly to a member of staff

The organisation will accept complaints via any reasonable channel and does not require individuals to use a specific format. Complaints may be made through any channel and do not need to follow a formal process. All staff must treat any expression of dissatisfaction about data handling as a potential complaint.

The organisation will ensure the complaints process is clearly signposted, easy to use, and accessible to all individuals. Information about how to raise a data protection complaint is included in the organisation's privacy notice.

5. Responsibilities

Data Controller: George Hannah Golf Club Manager

- Overall accountability for handling complaints
- Ensures compliance with legal requirements

All staff/associates

- Must recognise potential data protection complaints
- Must escalate complaints immediately to the Data Controller

6. Process for Handling Complaints

Step 1 – Receipt and Logging

- All complaints must be recorded in a **Data Protection Complaints Log**
- Record:
 - Date received
 - Complainant details
 - Nature of complaint
 - Method received

Step 2 – Acknowledgement (within 30 days)

- The organisation must acknowledge receipt within **30 calendar days**
- The acknowledgement will:
 - Confirm receipt
 - Outline the next steps
 - Provide an expected timescale where possible
 - Provide contact details for follow-up

Step 3 – Assessment and Clarification

- Confirm whether the issue is a data protection complaint
- Where unclear, seek clarification from the complainant
- Assess:
 - Nature and seriousness of the issue
 - Potential risks to individuals

Step 4 – Investigation

The organisation will, without undue delay:

- Gather relevant information and evidence
- Review:
 - Policies and procedures
 - Systems/processes
 - Any correspondence or data handling activity
- Interview relevant parties (if required)

The complainant will be kept informed of progress where appropriate.

Step 5 – Outcome and Response

Once the investigation is complete, the organisation will:

- Provide a written outcome explaining:
 - Findings
 - Whether the complaint is upheld, partially upheld, or not upheld
 - Any actions taken (e.g. corrective measures)
- Issue this response **without undue delay**

Step 6 – Right to Escalate

The final response will also:

- Inform the complainant of their right to escalate the complaint to the **Information Commissioner's Office (ICO)**
- Provide ICO contact details

7. Timescales

- Acknowledgement: within **30 days**
- Investigation and response: **without undue delay** (as soon as reasonably possible)

8. Record Keeping

The organisation will:

- Maintain a complaints log
- Retain records of:
 - Complaint details
 - Correspondence
 - Investigation findings
 - Outcomes and actions

Records will be retained in line with the organisation's data retention policy.

9. Learning and Improvement

The organisation will:

- Review complaints to identify trends or recurring issues
- Implement improvements to policies, procedures, or training
- Use complaints as part of ongoing compliance monitoring

10. Monitoring and Review

This procedure will be:

- Reviewed annually
- Following any significant complaint or regulatory change
- When ICO guidance is updated

11. Approval

Procedure Approved By: Executive Committee meeting on 08/07/26

Position: Chairman: Mark Goodman

12. Version History

Procedure First Introduced: 08/07/26

Procedure Last Review: n/a

Procedure Next Review: 08/07/27