

Data Protection Complaints Policy

The Adjutant General's Corps Charity

Document Owner: Adjutant General's Corps Assistant Corps Secretary

Policy Area: Data Protection and Information Governance

Version: 1.0

Effective from: October 2026

Purpose

The Adjutant General's Corps Charity (AGC Charity) is committed to protecting the privacy and personal information of all individuals whose information it processes. The Charity recognises that individuals have the right to raise concerns where they believe their personal information has not been handled lawfully, fairly or transparently. This policy establishes a clear, fair and consistent process for receiving, investigating and responding to complaints relating to the processing of personal data.

This policy supports RSTL's obligations under:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Data (Use and Access) Act 2025 (DUAA 2025)
- Privacy and Electronic Communications Regulations, where applicable
- Information Commissioner's Office (ICO) guidance

Scope

This policy applies to all personal data processed electronically, on paper, through photography, or through any other medium by or on behalf of the AGC Charity.

This includes information relating to:

- Members
- Employees
- Trustees
- Website users
- Any other identifiable individual

What is a data protection complaint?

A data protection complaint is any expression of dissatisfaction concerning how the AGC Charity has collected, used, shared, stored or retained personal information.

Examples include concerns about:

- Marketing communications
- Use of photographs
- Disclosure of information and suspected data breaches
- Security of personal information
- Data accuracy
- Handling of Subject Access Requests
- Deletion of information

Who can make a complaint?

A complaint can be made by:

- Any data subject
- A parent or guardian acting on behalf of a child
- A person holding legal authority to act for another individual
- A representative authorised by the data subject

The AGC Charity may request reasonable evidence of authority and identification where appropriate.

How to make a complaint

Complaints can be submitted by email, post or telephone.

By email

contact@rhqagc.com

By post

Data Protection Adviser (DPA)
HQ AGC
Gloucester Building
Worthy Down
WINCHESTER
SO21 2RG

What to include in your complaint

To help us investigate your complaint, please include:

- Your name
- Your contact details
- A description of your concern
- Relevant dates
- Any supporting evidence
- Your desired outcome

Complaint handling principles

Every complaint will be handled:

- Lawfully
- Fairly
- Objectively
- Confidentially
- Proportionately
- Without prejudice
- As quickly as is reasonably possible

Responsibilities

Board of Trustees

The Board of Trustees is ultimately responsible for ensuring appropriate governance arrangements exist for handling complaints.

Data Protection Adviser

The Data Protection Adviser (DPA):

- Receives complaints
- Coordinates investigations
- Maintains complaint records
- Ensures responses are issued
- Identifies lessons learned
- Reports significant matters to Trustees where appropriate

Employees

Employees must:

- Report complaints immediately
- Cooperate with investigations
- Preserve relevant records
- Maintain confidentiality

What happens when we receive a complaint?

Upon receiving a complaint, the Data Protection Adviser will:

1. Acknowledge the complaint.
2. Record it in the Complaints Register.
3. Assess the complaint.
4. Determine the action required.
5. Identify whether a data breach has occurred.

Acknowledgement

You will receive an acknowledgement within five working days.

This will include:

- A reference number
- Details of the investigating officer
- The expected timescale
- A request for further information, if required

Response times

AGC HQ will aim to issue a response within 30 days.

If the complaint is complex and additional time is required, the complainant will be informed of:

- The reason for the additional time
- The expected timescale
- Progress with the investigation

Possible outcomes

Following an investigation, AGC HQ may conclude that:

- No breach occurred.
- The complaint is upheld.
- The complaint is partially upheld.
- Insufficient evidence is available to reach a conclusion.

If you are dissatisfied with the outcome

If you remain unhappy with the outcome, you may request an internal review.

The review will consider whether:

- The investigation was thorough.
- All relevant evidence was considered.
- The decision was reasonable.
- Appropriate procedures were followed.

An internal review will not normally reinvestigate the complaint unless new evidence is presented.

Your right to complain to the Information Commissioner's Office

You have the right to complain to the Information Commissioner's Office (ICO) if you remain dissatisfied with how the Charity has handled your personal information.

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Telephone: 0303 123 1113
Website: <https://ico.org.uk/>