

Education and Learning Directorate  
Curriculum and Quality Improvement Team

**COMMENTS AND COMPLAINTS  
Central Staff and Schools Guidance  
Protocol for Complaints Handling  
2021**

## 1. INTRODUCTION

- 1.1 This document sets out the Process and Protocol that should be applied to all complaints and provides guidance for staff on dealing with Comments and Complaints. It outlines the process undertaken at service level at the point of entry to the completion of stage 2. **(Appendix 1 and 2)**
- 1.2 This document provides supporting information for **staff in Schools** about the Stage 1 process **(Appendix 1)** and on engaging with parents/carers who are making initial contact regarding a comment/concern or complaint **(Appendix 3)**
- 1.3 This document provides an overview of the Scottish Public Services Ombudsmen (SPSO) process for your information.
- 1.4 This guidance is aligned with Dumfries and Galloway Council Complaints Handling Procedures.

## 2. WHAT IS NOT A COMPLAINT?

- 2.1 Expressions of dissatisfaction which are raised should not automatically be considered as complaints. The following lists outline issues which **will not** be dealt with using the complaints process There are some things we cannot deal with through our complaints handling procedure. These include:
- **a first-time request for a service** (refer back to the school)
  - **a request for a second opinion** – direct Parent to “Ask us to Look Again” – <https://www.dumgal.gov.uk/article/17646/Parental-Involvement-ask-us-to-look-again>
  - **matters relating to services not provided by or funded by DGC** – ensure that we direct the customer to the appropriate organisation
  - **a previously concluded complaint** – refer to SPSO or back to original complaints handler for review
  - **complaints about employment matters** – (e.g. a grievance by a staff member or a grievance relating to employment or staff recruitment) - these are dealt with by HR – Redirect via [commentsandcomplaints@dumgal.gov.uk](mailto:commentsandcomplaints@dumgal.gov.uk)
  - **a complaint that is being or has been investigated by the Scottish Public Services Ombudsman (SPSO);** - no action to be taken
  - **complaints about Freedom of Information Act requests – information request – non-personal** - redirected to [educationandlearningFOI@dumgal.gov.uk](mailto:educationandlearningFOI@dumgal.gov.uk)
  - Freedom of Information (FOI) gives you the right to request and receive the information held by public authorities. The right applies to any information that is held by a public authority, and the authority must respond to each request within 20 working days of receiving it.
  - **concerns relating to Pupil Progress Report (PPR) should be redirected to the school (pupil educational records)** upon receiving a request by a parent for disclosure of their child’s educational records, shall within 15 school days, make them available for inspection, free of charge, to that parent.
  - **Subject Access Request (SAR)** – redirect to [dataprotection@dumgal.gov.uk](mailto:dataprotection@dumgal.gov.uk) to see what information is held about you or the person you are making the request on behalf of, you need to complete [Data protection \(dumgal.gov.uk\)](https://www.dumgal.gov.uk/data-protection) Making a Subject Access Request and provide proof of who you are. Records shall be shared within 20 school days.
  - **a complaint about which you have commenced or intend to commence legal proceedings** – no action to be taken.
  - **Complaints relating to one or more service-** redirected to comments and complaints for allocation to the appropriate department. [commentsandcomplaints@dumgal.gov.uk](mailto:commentsandcomplaints@dumgal.gov.uk)
  - **DGC General enquiries**, requests for service provision or faults reporting
  - **Statutory procedures** e.g. pupil placement requests and exclusion appeals. If these points are raised by parents, they should be directed to email [Educationsupport@dumgal.gov.uk](mailto:Educationsupport@dumgal.gov.uk)
  - **A concern about a child or an adult’s safety** – confirmation should be sought from the Safeguarding Officer or the MASH team.

### 3. WHAT IS A COMPLAINT

- 3.1 The **Scottish Public Services Ombudsman (SPSO)** provides the following example of the definition of a complaint:

*'A complaint is an expression of dissatisfaction by one or more members of the public about an organisation's action or lack of action, or about the standard of service provided by or on behalf of the organisation.'*

An expression of dissatisfaction should be treated as a complaint when: -

- there is an alleged service failure.
- customer/service user states 'I want to complain,' or 'I want to make a complaint'

### BEFORE WE RECORD A COMPLAINT WHAT, SHOULD WE DO?

#### 4. SERVICE LEVEL PROCESS (Central Staff/Directorate Support)

**If** the issue cannot be resolved **at school level** or is submitted directly to the service, the following process will be followed.

- The issue will be **assessed** to establish if it is appropriate to be dealt with through the complaint's procedure or other procedures and at a school or service level.
- The complaint proforma will be emailed to [educationandlearningcomplaints@dumgal.gov.uk](mailto:educationandlearningcomplaints@dumgal.gov.uk)
- The matter will be responded to within **5** working days **for Stage 1** or **20** working days for Stage 2 if formal investigation is necessary
- The Head Teacher will provide a response at Stage 1. Stage 1 responses primarily come from the Headteacher of the School. On occasion a response will be signed by the centre where appropriate but central staff will still require the Headteacher to address the complaint.
- **For your information only - Stage 2** responses require an Investigating Office and Responsible Manager. These will be identified from colleagues at the centre. All parties are interviewed, and recommendations are normally made with regards to improvement of the service where appropriate. These recommendations may be at school or authority level. School Colleagues will be kept informed through the Stage 2 process.

#### 5. SERVICE LEVEL PROCESS (Central Staff): DIRECTORATE SUPPORT ARE FIRST CONTACT

##### On the phone or face to face complaints:

- Staff should engage with the complainant by first enquiring if they have raised the issue with the School and who? class teacher or head teacher?
- If the response is NO, staff should encourage the complainant to try this first. It is important to stress that the school are there to support them as parents and their children and it is important to resolve issues at school level to rebuild trust and relationships.
- If the response is YES, staff should complete the initial complaint proforma in full.
- You should inform the complainant that you will need to complete a complaint record proforma and that this may take some time depending on the length of the answers.  
Each section of the proforma should be completed - <https://share.sp.dg.dgcouncil.net/Comments-Compliments-Complaints/>
- Key sections that must be completed are Name and confirm what the relationship of the complainant is if the complaint is linked to a child - **IT IS ESSENTIAL TO COMPLETE THE DESIRED OUTCOME.** This makes the possibility to resolve a complaint more quickly and with a positive outcome for the complainant and the school.

- Contact details – Postal Address, Email and Phone are also essential. As well as for contact for the response or any investigation this also provides confirmation of relationship to any child in the alleged complaint.

If the complainant is not the parent, they must be made aware that the parent must complete a mandate allowing the complainant to act on their behalf. To progress this you need to ask the complainant to provide contact information for the parent, in order that a mandate form can be posted or emailed. <https://share.sp.dg.dgcouncil.net/Comments-Compliments-Complaints/>

- Please ensure that a clean template is used for each complaint.
- Please ensure that this is not saved in SharePoint, but saved to school folder on the S-Drive
- Completed pro-forma to be sent to [EducationandLearningcomplaints@dumgal.gov.uk](mailto:EducationandLearningcomplaints@dumgal.gov.uk)

## 6. SERVICE LEVEL (School & Central Staff ) : HOW SHOULD COMPLAINTS BE PROGRESSED

### Resolving complaints

School or central staff should aim to resolve the complaint as soon as possible. It is possible to resolve a complaint out with the complaint process therefore if you wish to resolve this matter please do so within 5 working days and update us with any telephone calls/ notes of the discussion with the complainant as evidence that the matter was resolved.

### Complex complaints

In the case of complex complaints that may be emotive and made at a time of personal distress please contact the complaints team for advice or to pass the call on. **Comments and complaints involving any of the following should be brought to the attention of the Complaints Team by email and/or phone.**

- **Political, Media or Union Interest,**
- **Criminal activity, Legal issues or Compensation claims**
- **RIDDOR reportable accidents**
- **Allegations of staff misconduct**
- **Multifaceted, ongoing or frequent complaints**

### Contact Details:

Skills, Education and Learning Directorate

[EducationandLearningcomplaints@dumgal.gov.uk](mailto:EducationandLearningcomplaints@dumgal.gov.uk)

Heather Kerr 01387 723288 [Heather.Kerr@dumgal.gov.uk](mailto:Heather.Kerr@dumgal.gov.uk)

Vanessa Morris 07920528251 [Vanessa.Morris@dumgal.gov.uk](mailto:Vanessa.Morris@dumgal.gov.uk)

## APPENDIX 1 – SCHOOL AND SERVICE LEVEL: THE STAGE 1 PROCESS

### Notes on Stage 1 complaints

- Initial contact for telephone complaints is **DIRECTORATE SUPPORT** – The Complaints Pro-forma must be used at this stage – **FRONT LINE STAFF SHOULD KEEP COPY ON DESK TOP DIRECTORATE SUPPORT**
- A customer may complain in person, by phone, by email in writing – Written complaints should be forwarded to [EducationandLearningComplaints@dumgal.gov.uk](mailto:EducationandLearningComplaints@dumgal.gov.uk) . **DIRECTORATE SUPPORT**
- Ensure that you have spoken to the complainant about resolution at school level** Ask Us to Look Again information can be found at <https://www.dumgal.gov.uk/article/17646/Parental-Involvement-ask-us-to-look-again> **DIRECTORATE SUPPORT**
- Whilst stating that it is a complainant’s right to access our complaints process re-examine if this can be resolved out with complaints process **(CHP HEATHER KERR HK / VANESSA MORRIS VM )**
- First consideration is whether the complaint should be dealt with at stage 1 (frontline resolution) or stage 2 (investigation) of the complaints handling procedure. **(CHP HK AND VM)**
- POTENTIAL CHILD PROTECTION ISSUES RAISED SHOULD BE FORWARDED TO AUDREY LOWERY (COPY IN HEW SMITH) **(CHP HK AND VM)**
- For complaints being addressed by an advocate, i.e. advocacy service or family member – agreement must be sought from parent via signed mandate **Share-point Link:** <https://share.sp.dg.dgcouncil.net/Comments-Compliments-Complaints/> **(CHP HK AND VM)**
- The CH may choose to use a Headteacher response as submitted or redraft and send as the CH. This will be a professional judgement decision based on match of response to complaint points . **(CHP HK AND VM )**

### Stage 1 Process

Pro-forma/email/letter is emailed to the Head Teacher – giving instruction on providing a response and deadline for response – Ask HT for confirmation of receipt.

Upon receipt of HT response, HK/VM review and amend as required, if amended share again with HT before response goes to complainant

Response sent directly to the complainant by Respond Information system.

#### STAGE 1 A PROCESS

**Provide a written decision on the complaint within five working day OR provide a record of how this was resolved at School level through a phone call, face to face or tbc**  
**Email**  
[Educationandlearningcomplaints@dumgal.gov.uk](mailto:Educationandlearningcomplaints@dumgal.gov.uk)  
**with either response**

#### Stage 1 B Process

**Follow on Stage 1 to address any minor anomaly or more to Stage 2**

#### Stage 2 – investigation

- Investigate where the customer is still dissatisfied after we have communicated our decision at stage 1.
- Investigate where the complaint is particularly complex or will require detailed investigation.

**IF YES COMPLAINT CLOSED**

Is the customer satisfied with our decision and with the way we have handled the complaint?

**IF NO MOVE TO NEXT PROCESS STAGE 1 B**

## APPENDIX 2 – SERVICE LEVEL (Central Team): THE STAGE 2 PROCESS

### Stage 2 Investigation Process

#### Notes on Stage 2 Investigations

- **Guidance for Investigating Officers (IO)/ responsible Managers (RM) Share-point Link:** <https://share.sp.dg.dgcouncil.net/Comments-Compliments-Complaints/>
- POTENTIAL CHILD PROTECTION ISSUES RAISED SHOULD BE FORWARDED TO AUDREY LOWERY (COPY IN HEW SMITH) (**CHP HEATHER KERR / VANESSA MORRIS**)
- **Once IO and RM have been identified. Send all information relating to the complaint and the response template from Respond. Contact Complainant to provide details of RM and IO – Either via acknowledgement letter on day 3 or later when appointed.**
- **Complaint Handler should send reminders to RM and IO 5 working days before Response is due and 3 working days before response is due to be with complainant.**
- **Copy of Final Response should also be sent to an Advocate if used, Head Teacher/ Head of Service. Stage 2 is shared with HT for information only – not for consultation.**

#### Stage 2 – investigation

1. Investigate where the customer is still dissatisfied after we have communicated our decision at stage 1.
2. Investigate where it is clear that the complaint is particularly complex or will require detailed investigation.

Send acknowledgement within **three working days** and provide the decision as soon as possible but within **20 working days**, *unless* there is a clear reason for extending this timescale. Please note extended responses are recorded as late even if agreement sought and reported to the Chief Executive.

**A COPY OF THE RESPONSE SHOULD BE SENT TO HEAD TEACHER AND HEAD OF SERVICE WHERE APPROPRIATE**

**A SEPARATE APOLOGY LETTER FROM SENIOR MANAGEMENT SHOULD BE SENT IN THE CASE OF ANY**



If the complaint is progressed to the Scottish Public Services Ombudsman (SPSO), We are required to share **all** investigation correspondence and records (unredacted) within a 20-day notice period once the request has been made to the Chief Executive and Director of Education and Learning. Schools may be asked to provide additional information by the complaints team to support this work.

## APPENDIX 3 COMPLAINTS: HANDLING DIFFICULT CONVERSATIONS:

### SCHOOL / CENTRAL OFFICE STAFF GUIDANCE

This document provides guidance on good practice when conducting difficult conversations, to give you the confidence to tackle difficult issues and to ensure the success of the conversation. It covers the importance of dealing with difficult issues, preparation for and conduct during the conversation, and what steps should be taken following the conversation.

### RECORDING AND REPORTING OF DIFFICULT CONVERSATIONS

Increasingly we find ourselves in the position where, as part of our engagement with parents/carers and members of the public we may be overtly or covertly digitally recorded.

- As a professional you should always ensure that you are meeting the requirements of the Councils general **Employee Code of Conduct Policy** and that you remain professional despite the attitude of the parent/carer or member of the public.
- As an employee you are protected by the **Councils Dignity at Work and Fair Treatment at Work (LGE and Teachers and Associated Professionals Policy)** and if you at any time feel under distress or in fear for your safety, you should ask the parent/carer/member of public to leave and report the incident as soon as possible by escalating to your senior manager or Headteacher.

### HOW TO MANAGE DIGITAL RECORDINGS OF PHONE CALLS / MEETINGS

If a parent/carer openly discloses that they wish to record your meeting/ or are recording your telephone conversation you should take the following steps.

1. Clarify with the parent why they are recording the meeting/call and note this.
2. Agree with them that if the meeting/call is recorded you would ask that they share a copy of their recording and agree at the time how this is best done and note this.
3. That you will also record the meeting for your own school records. There are recording facilities within Teams that allow you to record meetings and save as audio and word files. However, you must **not record** a parent without first seeking consent from the parent. Please use the attached consent form if you intend to record a meeting or seek verbal agreement over the phone and record this. (Appendix 4)
4. If the parent does not provide consent for you to digitally record them, you should ask for a colleague to join you for the meeting as a witness/note taker in order that you can action any points from the meeting. It is highly unlikely that a parent would withhold consent to a recording if they are recording themselves.
5. If the parent is on the phone put the call onto speaker so that you can record this on your phone/computer or are able to call upon a colleague to witness the call. Consent must still be sought if you are making a digital recording and consent should be captured in your own recording or noted on the consent form that you sought verbal agreement.
6. When recordings are undertaken you should be aware of sharing any information that does not directly relate to the concern and refrain from any declarations implying errors or shortcomings by the school that may break a breach of confidence.
7. As with all school records these can be requested or used to confirm points of complaint in a Stage 1 or Stage 2 process or in a potential court proceeding so standard records management should be followed in line with your information security policy.
8. If the child is present and over the age of 12 consent from the child should also be sought and recorded. However, if they are not present consent is not needed as the teacher is still able to discuss the child's education with the parent.
9. If a formal complaint commences the complaints team may ask the school to share these recordings along with any other statements as part of the Stage 1/2 process.

**NOTE:** There is no breach of criminal law when a private individual records a conversation with a member of teaching staff without their knowledge or consent but Teachers (member of Dumfries and Galloway Council Staff) require consent. If within the recording, you shared personal information noting that this should not be shared, and it was later shared you would be able to report this to the Information Commissioner.

## DIFFICULT TOPICS OF CONVERSATION

The following pages will help you in a situation where are dealing with a complainant. There are two key areas to consider: **1 How you Communicate AND 2 How you Listen.**

### 1. Communicate.

- **Set the right tone:** You should begin the conversation in a professional manner as this will encourage a professional attitude throughout the correspondence and help to achieve a successful outcome. Beginning the conversation in a non-threatening manner will also make the complainant feel at ease and encourage them to speak openly. **To set the stage, you could start by thanking the caller for bringing the matter to our attention and apologies that we are communicating under these circumstances.**
- **State the issues clearly:** To avoid misunderstanding, you should ask the caller to state clearly what the issue is. Tell the caller that you will be taking down the details of their complaint and passing this to the most appropriate staff member to resolve the issues for them. All points should be written down immediately to avoid any misunderstanding, and also clarify the issues with the complainant on conclusion of the conversation.
- **Be clear about process:** You should be clear that you may not be able to answer the query. Depending on the time of the call you should be clear that a response may not be available until the end of the day or the following day (in most cases). **IF taken by central staff this will follow a Stage 1 – 5 day process** within which Schools will provide a response to the complaints team.
- **Emailing:** In a small school it may be possible to pass on the handwritten note directly to the Headteacher or appropriate staff member directly. In the case of a larger school it is important to send the email comment/complaint directly to the member of staff. If a point of complaint escalates this evidence can be used to show that the concern was passed on in a timeously manner.
- **Expectations:** It is important to reassure the complainant that all concerns are taken seriously and that the school will look to resolve any issue as quickly as possible. Explain to the parent that staff work with a number of children and that if a member of staff does not get back to them today it will be due to other existing and planned activities with other children and that this does not lessen the importance of their concern.
- **Expectations:** An immediate response required. If you have a parent who expects to speak to the Headteacher, but the HT is not available just explain that they are out of the office / or in a class. Do not share any personal information about your Headteacher or colleagues.
- **Focus on the issue, not the person:** You should avoid expressing your own opinion. This can be done by focusing on facts, avoiding generalisations and comments on the individual or the situation.
- **Avoid an attitude of blame:** The issue needs to be addressed in a collaborative way. Don't approach a conversation with an attitude of "us v's them", but with an attitude of "both versus the problem".
- **Avoid belittling the issue:** our own fear of a difficult conversation could lead us to belittle the issue, avoid phrases such as "it's really not a big deal"
- **Be positive:** You should be bold and state that you want a successful outcome. This will give a constructive tone and feel to the conversation even if the situation seems bad.
- **Body language:** We should adopt neutral body language by not crossing arms and speak in a calm tone of voice at a moderate volume. Our attitude will usually be replicated by the caller.
- **Identify another member:** If the complainant is not willing to discuss the matter with you, try to identify another member of staff for the complainant to speak to.



## 2. Listen

Being listened to is empowering. We should think of a situation when someone genuinely listened to us and recall how we felt and reacted to this. Being listened to can help callers feel that they are being taken seriously and will help us to gather useful information about the comment/complaint.

### Dos and Don'ts

**Do** ask for the individual's view, this could help to find an appropriate solution

**Do** use open questions such as "what is your view on that?"

**Do** listen to and acknowledge their point of view.

**Do** appreciate the value of silence. This allows the individual time to gather their thoughts.

**Do** ask if you have not understood what has been said, by saying, for example, "OK, I need to be clear about that, so can we go over it again".

**Do** summarise the main points of what the caller has said. This is useful as it shows that you have listened, helps to consolidate your thoughts and helps you to decide where the conversation should go next. Finding out what the 'desired outcome' is may often help resolve an issue ensuring you make no guarantees that this will be met.

**Do** check that the caller has understood what you have said. For example, say "we need to finish up, it might be useful to go over what we've discussed... to summarise we have..."

**Don't** jump in while the individual is speaking.

**Don't** answer questions that you have put to the complainant to answer.

**Don't** ask multiple questions as this can come across as intimidating and prevent the caller from giving a useful answer.

### DEALING WITH A CALLERS DIFFICULT ATTITUDE

The topic under discussion may be a sensitive issue. Some callers may react negatively, by becoming upset, angry or verbally abusive. There are several things that we can do to ensure that the conversation remains productive.

**Remain calm.** It is our responsibility to achieve a successful outcome to the call and this can be done only if we remain calm and refrain from bringing our own feelings into play. Staff should remain objective and refrain from making any personal accusations or becoming angry.

**Let the caller "vent".** It is important that the caller calms down. However, allowing the caller some time to vent their anger or frustration, gives them space and a feeling of being listened to. The caller may also reveal information that may help in finding a resolution to the problem.

**Remember that the issue needs to be dealt with.** When faced with a difficult attitude, we will often be tempted to hang up in the hope that the person will calm down. However, this can make both parties lose sight of the issues

## HANDLING DIFFICULT CONVERSATIONS COMMUNICATION SKILLS – QUESTIONING

| Type of question   | Example   | Benefits  | Drawbacks   |
|--|---|---|---|
| Open question  | To what extent would you say?<br><br>How do you feel about?<br><br>Open questions normally start with who, where, what, why, when or how. | These encourage the other person to talk freely, as little or no restriction is placed on their answer. They enable people to 'open up' on any topic, opinions or feelings. | The person may talk too much, drift away from the subject you have in mind and start to control the conversation. To avoid this, try using a qualifier. For example, 'Very briefly, tell me how you..' or 'In a few words...' |
| Closed questions   | What time did it happen?<br><br>What was the injury?  | These questions can be effective in verifying specific information, re-focusing on the subject in hand or emphasising a vital point.  | They can be very unhelpful when dealing with feelings. For example, 'Did that make you feel bad?' may not illicit the depth of response you were hoping for.  |
| Probing/reflective questions   | What, in particular, made you feel like that?<br><br>Are you telling me that?   | Useful in seeking depth and detail.   | The caller may feel threatened. Attention must be given to anticipating and monitoring the effect on the person.  |
| Leading questions  | You're not suggesting that ...?<br><br>You must admit that ...?   | <b>These questions should be avoided.</b>   | You may run the risk of putting words in someone's mouth and leading them towards your own conclusions.   |
| Multiple questions   | Can you tell me what happened, how you felt and what you did about it?  | <b>These questions should be avoided.</b>   | The person is unsure what part of the question to answer first and confusion can arise.   |
| Deciding which questioning technique to use and when: at the start of the discussion it is usually best to ask open questions you might then follow up with probing questions, with information verified using closed questions where necessary. |   |   |   |

This document is based on DGC Guidance Handling Difficult Conversations, for further information please follow link:

[https://share.sp.dg.dgcouncil.net/ODHRPolicies/\\_layouts/15/WopiFrame2.aspx?source=5D78CAC6-1452-4554-8E7D-08C56210CA58&file=Guidance%20%20Handling%20Difficult%20Conversations.docx&action=default](https://share.sp.dg.dgcouncil.net/ODHRPolicies/_layouts/15/WopiFrame2.aspx?source=5D78CAC6-1452-4554-8E7D-08C56210CA58&file=Guidance%20%20Handling%20Difficult%20Conversations.docx&action=default)

AND DGC Complaints Handling Process

<https://www.dumgal.gov.uk/article/15382/Complaints-procedure>

**APPENDIX 4 CONSENT FORM - to be shared with all parties**



**Digital Recording Consent Form:** This form is used by Dumfries and Galloway Council when we intend to record a meeting with a parent/carer as a record of a meeting; as an aide memoire AND when we are asking for a copy of a parental recording.

As a parent/carer you do not require a consent form to be signed by Dumfries and Galloway staff, but as an employee of the Council we must seek your consent if we wish to digitally record the meeting/conversation.

The following table should be completed in ALL cases where Dumfries and Galloway Council make a digital recording. \* ***If telephone conversation note verbal agreement.***

| Date, Time and Location of meeting                     | Those in attendance. list full name and role | Signature |
|--|--|-----------|
|  |  |           |
|  |  |           |
|  |  |           |
|  |  |           |
| Reason for the digital recording should be noted here: |  |           |

If you do not provide consent, we will either ask

- for a colleague to join the meeting/conversation as a witness/note taker
- that you share a copy of your recording with us

If you do not give consent for Dumfries and Galloway Council or we are unable to record the meeting/conversation, but you agree to share your recording with us, please complete the following.

**Parental Declaration:**

I (print your full name).....

agree to sharing the digital recording of our meeting of (date, time, location)

.....

With (School Name and staff member) .....

.....By (shared by date)

**Consent Form Guidance Notes:** A copy should be made and given to the parent/carer before they leave the meeting. The original should be retained, and an electronic copy retained on SEEMIS. If you would like more information on how we hold data about you, please visit Dumfries and Galloway Council, Skills, Education and Learning Directorate Privacy Notice <https://dumgal.gov.uk/media/22272/Privacy-Notice-Education-and-Learning-Directorate/pdf/Privacy-Notice-for-Education-and-Learning-Directorate.pdf?m=637121953387870000>