

Data complaints policy

1. We are committed to providing a high-quality service, in accordance with data protection law. At all times, we seek to comply with data protection principles by ensuring we:

- process personal data lawfully, fairly and in a transparent way;
- collect personal data for specific and legitimate purposes and do not process personal data in a way that is incompatible with those purposes;
- collect and use adequate, relevant and minimal personal data;
- take reasonable steps to make sure personal data is accurate and kept up to date;
- do not keep personal data longer than necessary; and
- implement appropriate security measures.

2. We acknowledge that we may not always get things right, so if something has gone wrong, we need you to tell us. This will help us to improve our standards of service and data protection controls.

3. How to make a complaint

3.1. You can contact us in writing (by email to the following email address [insert email address] using the words 'Data Complaint ' in the subject heading. Alternatively you can send a letter to the postal address set out in our Privacy Policy).

4. Acknowledging and verifying your complaint

4.1. We will contact you within [this must be less than 30 days [seven]] days acknowledging your complaint.

4.2. We will take reasonable steps to verify the identity of the person making the complaint. This may involve requesting further information or documentation from you. If the complaint is made on behalf of someone else, we will also need to check that the person making the complaint is properly authorised to do so.

4.3. If, having requested additional information, we are not in a position to identify the person making the complaint or we are not satisfied that they have proper authority to make the complaint, we may refuse to deal with it - see section 7.2.1 below.

5. Investigating your complaint

5.1. We will investigate your complaint. This will usually involve:

5.1.1. reviewing your complaint;

5.1.2. locating and reviewing the records we hold about you;

5.1.3. establishing the relevant facts; and

5.1.4. liaising with individuals who you may have dealt with.

5.2. We may also need to ask you for further information or documents. If so, we will ask you to provide the information within a specific period of time.

5.3. We will update you on the progress of your complaint at appropriate times.

6. Notifying you of the outcome of our investigation

6.1. We will contact you at the end of our investigation to tell you what we have done and what we propose to do to resolve your complaint.

6.2. We usually aim to do this within 30 days of the date of receiving your complaint. However, this time period may be extended where:

6.2.1. we ask you to provide further information to verify your identity or your authority to make the complaint, or in relation to the complaint itself;

6.2.2. your complaint is complex or involves locating and/or reviewing a large volume of information; or

6.2.3. you have made several complaints, which we need to investigate at the same time.

6.3. We will tell you if we need more time to properly investigate your complaint and explain why.

7. Refusing to deal with your complaint or charging a fee

7.1. We prefer to deal with complaints and, preferably, to resolve them. We will not usually charge a fee for handling a complaint.

7.2. We may, however, refuse to deal with a complaint where:

7.2.1. after requesting additional information in accordance with section 4.2, we are not in a position to identify you and/or to verify that you are authorised to make the complaint; or

7.2.2. we have asked for more information in relation to the complaint itself (section 5.2), but you have not provided this within a reasonable time.

7.3. Where we consider the complaint to be manifestly unfounded or excessive, eg because you have made the same complaint repeatedly, we may:

7.3.1. refuse to act on the complaint; or

7.3.2. charge a reasonable fee for dealing with the complaint, based on our reasonable administrative costs - we will notify you of the proposed fee in advance of incurring it.

8. What to do if we cannot resolve your complaint

8.1. If you are unhappy with the outcome of your complaint, you can complain to the data protection authority of the country where you are based. In the UK this is the Information Commissioner's Office (ICO), or you can seek to take action in the courts.

8.2. The ICO's contact details are:

Address	Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF
Helpline number	0303 123 1113

More details on how to complain to the ICO are available on the [Complaints page](#) of the ICO's website. You should usually submit your complaint to the ICO or other data protection authority within three months of your last contact with us.