

Personal Data Complaints Procedure

Introduction

This procedure addresses complaints from data subject(s) related to the processing of their personal data, Trinity's handling of requests from data subjects, and appeals from data subjects on how complaints have been handled.

Responsibilities

All employees/staff are responsible for ensuring any complaints made in relation to the scope of this procedure are reported to the Data Protection Officer, who is responsible for dealing with all complaints in line with this procedure.

Procedure

Data subjects can complain to Trinity about the following:

- How their personal data is processed
- How their request for access to data has been handled
- How their complaint has been handled
- Appeal against any decision made following a complaint

To enable a data subject to lodge a complaint, clear guidelines are set out on Trinity's 'Contact Us' web page. The guidelines include the Data Protection Officer's contact details, a complaint form and Trinity's **Privacy Statement** which is made available for the data subject(s) to view.

When a data subject completes and submits a complaint form, this is sent directly to the Data Protection Officer's mailbox. Trinity will acknowledge complaint forms within 3 working days of receipt. Trinity will endeavour to provide a full response and an explanation within 10 working days, this is to allow time for any investigation required to be carried out. This is in line with Trinity's **Complaints Policy**.

Appeals on the handling of complaints are to be sent to the Chief Executive. Complainants can expect the Chief Executive to acknowledge within 3 working days of receipt and a response within 15 working days. The Chief Executive's decision is final. Trinity's aim is to resolve all matters as quickly as possible. Inevitably, however, some issues will be more complex and therefore may require longer to be fully investigated. Consequently, timescales given for handling and responding to complaints are indicative. If a matter requires more detailed investigation, an interim response will be sent to the data subject describing what is being done to deal with the matter, and when a full reply can be expected and from whom. This is in line with Trinity's **Complaints Policy**.

Document Owner and Approval

The Data Protection Officer is the owner of this document and is responsible for ensuring that this procedure is reviewed in line with operational and General Data Protection Regulation (GDPR) requirements.

A current version of this document is available to all members of staff.

This procedure was approved by Trinity's Executive on 23 May 2018 and is issued on a version controlled basis.

Document History				
Version	Details of Amendment	Date	Owner	Approved
0.1	First Draft	24 April 2018	Compliance Manager	