

Personal Data Complaints Procedure

Introduction

This procedure addresses complaints from a data subject 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.

Scope

This procedure applies to:

- all Trinity employees, workers and trustees; and
- all consultants, contractors, agency or temporary workers and other service providers engaged by Trinity, where the contract between Trinity and such party specifies that they are to comply with Trinity's policies and procedures.

It is the responsibility of each party listed above to familiarise themselves with this procedure and comply with it.

Trinity reserves the right to amend this procedure without notice.

Related Documents

This policy should be read in conjunction with:

- [the Data Protection Policy](#);
- Trinity's privacy statements available on the intranet or at <https://www.trinitycollege.com/page/data-protection>;
- [the Data Protection by Design and by Default Policy](#);
- [the Data Protection Impact Assessment Procedure](#);
- [the Data Protection Impact Assessment Form](#);
- [the Data Destruction Policy](#);
- [the Data Destruction Procedure](#);
- [the Data Retention Policy](#);
- [the Data Retention Schedule](#);
- Data Subject Request Policy;
- Data Subject Request Procedure
- Policy on the Sharing and Transfer of Personal Data;
- the procedure for updating the Record of Processing Activities; and
- Trinity's other policies related to data protection and IT security located on the intranet under the Resources section.

Main Responsibilities

The General Counsel and the DPO have overall responsibility for the operation of this procedure. All directors, managers (and designated project leaders, where applicable) are responsible for ensuring adherence to this procedure within their teams. All employees and workers are responsible for ensuring any complaints made in relation to this procedure are reported to the DPO immediately.

Procedure

Data subjects may complain to Trinity about the following:

- how their personal data is processed;
- how their data subject request has been handled; and
- how their complaint has been handled.

Data subjects may also 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 data protection internet web page (<https://www.trinitycollege.com/page/data-protection>). The guidelines include the DPO's contact details. The data subject can also view Trinity's Data Protection Policy and privacy statement on the same webpage.

Investigating a complaint

When a data subject submits a complaint, this is usually sent directly to the DPO's mailbox (dpo@trinitycollege.com). Where a data subject's complaint about the processing of their personal data is sent to any other employee, worker or mailbox within Trinity, the relevant employee, worker or team should immediately forward the complaint to the DPO's mailbox (dpo@trinitycollege.com) and the DPO will acknowledge the complaint. Trinity will endeavour to provide a full response and an explanation within 30 working days. This is to allow time for any investigation required to be carried out and is in line with Trinity's [Complaints Policy](#). However, complex issues may require more time to be fully investigated. If this is the case, we will explain the reasons for the delay and provide regular updates until the investigation into the complaint has been concluded.

Unsatisfactory resolution to a complaint

If a data subject is not satisfied with the response to their complaint, they can email legal@trinitycollege.com for the attention of Trinity's Chief Executive's Office, providing an explanation of why they disagree with the findings and request that their complaint be reviewed. Complainants can usually expect a response from the Chief Executive Office within 30 working days. Please note that the Chief Executive's Office will only review a complaint once the formal complaint procedure has been concluded.

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.

Data subjects can also contact or make a complaint at any time to the ICO on 00 44 (0)303 123 1113.

Additional notes

Trinity takes all complaints seriously and is committed to resolving matters fairly and impartially. Trinity asks that all correspondence remains mutually respectful and professional. Trinity reserves the right to terminate any communications that Trinity reasonably believes are persistent, abusive, threatening or offensive.

Trinity would not usually re-visit a case once it has been concluded unless new evidence comes to light. For this reason, Trinity may terminate contact with a complainant who persists in communicating with Trinity regarding the same issue.

Records

A record should be maintained of all data subject complaints received.

Reference Documents

The relevant Trinity policies listed under 'Related Documents' above.

Document History				
Version	Details of Amendments	Date	Owner	Approved
0.1	First version	24 April 2018	Compliance Manager	24 May 2018
1.0	Some formatting and drafting changes. Document owner changed.	20 August 2024	Data Protection Officer	2 September 2024