

How to make a data protection complaint

Individuals can make a data protection complaint to RCBIM through any of the channels below. We will accept a complaint received through any other channel, but the routes below are the most direct.

By email: dataprotection@rcbim.co.uk

By post: Data Protection Complaints, RCBIM 1 The Square, Temple Quay, Bristol

By telephone: 01179 256073 (ask to be put through to the Compliance team)

Information we need from you:

To help us deal with a complaint efficiently, we ask (but do not require) the individual to:

- Describe the issue and what outcome they would like.
- Provide enough information for us to identify the personal data and processing they are concerned about.
- Confirm whether they are complaining on their own behalf or for someone else, and provide evidence of authority where applicable.

We use plain language in our communications and accommodate reasonable preferences as to language, channel, or format (for example, large print).

Investigating your Data Protection Complaint

Acknowledgement

We acknowledge a data protection complaint within 30 days of receiving it. The 30-day period begins the day after we receive the complaint. If the 30th day falls on a weekend or public holiday, we acknowledge by the next working day.

Where we are able to complete our investigation within 30 days, we will issue the outcome rather than (or alongside) a separate acknowledgement.

Acknowledgement is normally issued in writing through the channel the complainant used, unless they ask us to use a different channel. Where a complaint comes in via social media, we ask the individual for an alternative, more secure channel before discussing personal data.

Identity and authority checks

We only investigate a complaint once we are satisfied as to the complainant's identity. If we already hold sufficient information, we will not ask for more. Where we cannot confirm identity from information we already hold, we request proof of identity at the earliest opportunity.

Where someone is complaining on behalf of another person, we ask for evidence of their authority before investigating. Acceptable evidence usually takes the form of a signed letter of authority from the data subject or an appropriate power of attorney. If we have doubts about the validity of a letter of authority, we may contact the data subject directly.

Investigation

Our investigation begins as soon as we receive the complaint. We do not wait for the 30 day acknowledgement period to end.

The level of enquiry is proportionate to the issue. Depending on the complaint, we may:

- Review the relevant facts, records, and correspondence.
- Speak to the staff members involved.
- Compare what we have done with our policies, contracts, and applicable law.
- Ask the complainant for further information where this is needed to investigate properly.

We conduct the investigation without undue delay. What this means in practice depends on the complexity and scale of the issue, any harm the individual may be experiencing, and how quickly information is available. We do not apply a fixed deadline as a blanket rule: where we can resolve a complaint quickly,

we will, and where the issue is more complex, we take the time we need while keeping the complainant informed.

Keeping the complainant informed

We keep the complainant updated on progress without undue delay. In practice, this usually means an initial acknowledgement, a follow up where the investigation will take more than a short period, and a clear outcome at the end. Where we expect a material delay, we explain why, give the complainant a point of contact, and provide an expected timeframe.

Outcome

We provide an outcome to the complainant without undue delay once the investigation is complete. The outcome:

- Addresses each point raised in the complaint.
- Explains what we found and why.
- Sets out any actions we have taken or will take as a result.
- Confirms the complainant's right to refer the complaint to the Information Commissioner's Office ("ICO") if they remain dissatisfied.

If the complainant is unhappy with the outcome, we may offer further clarification or an internal review. The complainant does not have to wait for any internal review before complaining to the ICO.