

CHRIST'S HOSPITAL

DATA PROTECTION COMPLAINTS POLICY

Concerns or complaints relating to the data protection rights of individuals on whom Christ's Hospital (CH) processes personal data, should be directed in writing to the Data Protection Officer (DPO) at the following address:

Christ's Hospital
Horsham
West Sussex
RH13 0LJ
Or email: enquiries@christs-hospital.org.uk

The concern or complaint will be investigated by the DPO and normally be acknowledged within three working days of receipt, indicating the action being taken, the likely response timescale and requesting any additional information or documentation that is necessary to be able to fully investigate the matter. If there is any doubt about the identity of the complainant, the DPO will first seek to verify the data subject's identity. Any timescales given below will start from the date that the concern or complaint is received, the date that necessary additional information is received or the date that data subject identity is verified, whichever is the later.

The DPO will normally respond to the complainant within 10 working days. If this is not achievable, the DPO will inform the complainant and confirm a longer response time.

A complainant who is not satisfied with the response provided by the DPO may ask for the complaint to be referred to the Business Manager at the above address. A request for review by the Business Manager must be submitted within five working days of receipt of the DPO's response. The Business Manager will investigate the matter; this may involve requesting additional information or documentation from the complainant.

The Business Manager will acknowledge receipt of the request for review within three working days of receipt and will normally respond to the complainant within 15 working days. If this is not achievable, the DPO will inform the complainant and confirm a longer response time.

In all circumstances, the complainant should be clear as to the nature of their concern or complaint and as to the outcome being sought. Potential outcomes include, but are not limited to, the deletion, restriction or correction of records or qualification of comments forming part of a record.

If the complaint is about the conduct of the DPO, the complaint should be directed to the Business Manager in the first instance. In such cases, a request for review of the Business Manager's response should be directed to the Chief Operating Officer at the above address. In either circumstance, the Business Manager or Chief Operating Officer's decision is final and there is no further right of review.

At any point in the process set out above, a data subject is entitled to make a complaint to the Information Commissioners Office (ICO) and ultimately seek to enforce their rights through a judicial process. However, the advice of the ICO is to complain to the organisation in the first instance and it is therefore likely that a complaint sent to the ICO that has not first been raised with CH will be redirected to CH, before the ICO will investigate.

For the avoidance of doubt, in relation to this policy, 'working day' means Monday to Friday, 09.00 to 17.00, excluding public holidays and all days between Christmas and New Year.

Author: AXP
Date of last review: May 2023
Next review due: May 2026