



SHIRAZ BADAT

TECHNICAL SOLUTIONS, PROFESSIONALLY PROVIDED

DATA PROTECTION COMPLAINTS PROCEDURE

Version: 1.0

Effective Date: 19th June 2026

Review Date: 19th June 2027

Owner: Data Protection Officer

1. Purpose and Scope

This procedure sets out how Shiraz Badat handles data protection complaints from individuals about how we collect, use, store, or share their personal information.

This obligation arises from **Section 164A of the Data Protection Act 2018**, inserted by the Data (Use and Access) Act 2025, which requires all UK data controllers to maintain a formal complaints process effective from 19 June 2026.

Applies to: All employees, contractors, volunteers, and third-party processors acting on behalf of Shiraz Badat.

2. Who Can Complain

Any individual whose personal data we process may submit a data protection complaint if they believe we have mishandled their information. This includes concerns about:

Concern Type	Examples
Data Access	Denied DSAR, incomplete responses, excessive charges
Data Accuracy	Incorrect information held about them
Data Deletion	Refused erasure request
Data Sharing	Unauthorised sharing with third parties
Data Security	Suspected breach or security failure
Marketing	Continued marketing despite opt-out requests
Profiling/Automated Decisions	Concerns about automated processing decisions
Other	Any other data protection issue not covered above

3. How to Make a Complaint

Primary Channel

- **Email:** dataprotection@purpletree.solutions
- **Post:** 78 St Catherine Street, Gloucester, GL1 2BX
- **Phone:** 07961818654

Accessibility Requirements

- The complaints channel must remain active during normal business hours
- We will accept complaints in any reasonable format (email, letter, phone, face-to-face)
- Reasonable adjustments will be made for individuals with disabilities or accessibility needs
- We will accept complaints in writing on behalf of someone else (e.g., via power of attorney or parent/guardian) with appropriate verification

Initial Information Required from Complainant

For us to process the complaint effectively, please include:

- Your full name and contact details
- The subject matter of your complaint (what went wrong)
- When you believe the issue occurred
- What resolution you are seeking
- Any relevant correspondence or evidence
- Reference numbers (if you previously contacted us about this)

4. Acknowledgment Process

Step	Timeline	Responsible Person
Complaint received	Day 0	First Point of Contact
Complaint logged in register	Within 1 working day	Complaints Handler
Formal acknowledgment sent	Within 5 working days (target) / 30 calendar days (maximum legal)	Complaints Handler

The acknowledgment will confirm:

- Receipt of the complaint
- A unique reference number
- The name of the person handling it
- Expected next steps and timeline
- How the complainant can follow up

5. Investigation Process

Upon receipt, the complaint handler will:

1. **Initial Triage** (within 5 working days of acknowledgment)
 - Verify the complainant's identity
 - Determine the nature and scope of the complaint
 - Identify relevant systems, records, and third parties involved
2. **Information Gathering** (within 10 working days of triage)
 - Request relevant documentation from departments
 - Consult third-party processors if applicable
 - Review previous interactions with the complainant
 - Preserve relevant evidence
3. **Assessment** (within 15 working days of information gathering)
 - Evaluate whether a breach occurred
 - Assess impact on the complainant
 - Determine what remedial action is necessary
4. **Escalation Path**
 - If unresolved after first review → Senior Complaints Officer
 - If complex or cross-departmental → Data Protection Committee
 - If serious breach identified → ICO notification protocol activated

6. Response to Complainant

We will provide a written response within **30 calendar days** of receiving the complaint.

The response will include:

Element	Description
Findings	Clear explanation of what happened
Assessment	Whether we agree there was an issue
Remedial Action	Steps being taken to fix the problem
Future Prevention	Changes to prevent recurrence
Further Rights	Right to escalate to ICO if dissatisfied
Contact Details	For further queries on this complaint

If more than 30 days is required due to complexity, we will inform the complainant of the delay and revised timeline at least 7 days before the original deadline expires.

7. Complaints Register

All complaints must be recorded in the **Data Protection Complaints Register**. The following minimum data points must be captured:

Field	Required
Unique reference number	✓
Date complaint received	✓
Complainant name (or anonymous identifier)	✓
Nature of complaint (category)	✓
Date acknowledgment sent	✓
Investigator name	✓
Key investigation findings	✓
Outcome / resolution provided	✓
Date final response sent	✓
Any ICO escalation	✓
Retention period end date	✓

Retention: Complaints records will be kept for a minimum of **6 years** unless longer retention is required for regulatory purposes.

8. ICO Escalation

Complainants always retain the right to take their complaint to the Information Commissioner's Office at any point.

Our process includes:

- Making this clear in our acknowledgment letter
- Providing ICO contact details (ico.org.uk/make-a-complaint)
- Notifying the ICO promptly if we become aware of a reportable breach alongside complaint escalation
- Cooperating fully with any ICO investigation arising from a complaint

Internal escalation triggers:

- Complaint remains unresolved after initial response

- Complainant indicates intention to go to ICO
- Complaint reveals systemic data protection failure
- Complaint involves sensitive data categories requiring special handling

9. Staff Training Requirements

All staff who may encounter data protection complaints will receive training covering:

Topic	Frequency
Identifying data protection complaints vs general feedback	Annual
Logging complaints correctly	Onboarding + Annual refresh
Timeframe obligations and escalation triggers	Annual
Maintaining confidentiality	Onboarding
Use of complaints register	Onboarding + As needed

Training records will be maintained by the Data Controller.

10. Monitoring and Review

Activity	Frequency	Owner
Review complaints register for trends	Monthly	DPO
Report to Board/Directors on complaint metrics	Quarterly	DPO
Full procedure review and update	Annually	DPO
Test complaint channels (mystery shopping)	Biannually	Compliance