

UPPINGHAM

UPPINGHAM SCHOOL RETIREMENT BENEFITS SCHEME ('USRBS')

DATA PROTECTION COMPLAINTS PROCEDURE

Introduction

1. The Trustees of USRBS are committed to protecting the personal data of members, deferred members, pensioners, and widows, widowers or dependants of deferred members or pensioners, and to handling such data in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, other relevant legislation, and the Scheme's Data Protection Impact Assessment.
2. This Data Protection Complaints Procedure sets out how individuals may raise concerns or complaints specifically relating to the Scheme's handling of personal data.
3. Complaints under this Procedure may be made by employed deferred members; deferred members; pensioners; widows, widowers or dependants of deferred members or pensioners of the Scheme; and someone claiming to be one of the above.
4. This Procedure is made available on the Scheme's website and by writing to data@uppingham.co.uk. It may also be made available on request to the Information Commissioner's Office (ICO), The Pensions Regulator (TPR) or other regulatory bodies.

What constitutes a data protection complaint?

5. A data protection complaint is an expression of dissatisfaction relating to the way in which the Scheme has collected, used, stored, shared, or otherwise processed personal data.
6. Examples include:
 - Alleged failure to comply with a subject access request or other data subject rights;
 - Alleged unlawful disclosure of personal data;
 - Concerns about data accuracy, security, or retention;
 - Concerns that data has been processed without a lawful basis.
7. Data protection complaints should be submitted using the attached *Data Protection Complaint Form*.
8. The Scheme will acknowledge all complaints within thirty days of receipt.
9. The Scheme will then investigate the complaint without undue delay. The Scheme will make appropriate enquiries, and look at all relevant facts thoroughly, fairly and accurately. The investigator will speak to relevant members of staff, and will compare the information in the complaint with the information held by the Scheme.
10. The Scheme will aim to respond to all complaints without undue delay. Where a complaint is particularly complex, and additional time is needed, the Scheme will let the complainant know in a timely manner. When responding, the Scheme will explain how it reached its conclusion, and any actions it has taken as a result of the complaint.
11. Anonymous complaints will not be investigated.
12. If the complainant is unhappy with the Scheme's conclusion, they have the right to complain to the Information Commissioner's Office (contact details below).

Person Responsible for Data Protection

13. Where an individual has a complaint about the Scheme's processing of personal data, they should contact the School at data@uppingham.co.uk. The complainant will be asked to set out their complaint in a *Data Protection Complaint Form*.
14. The Scheme has appointed the Scheme Secretary as the Privacy and Compliance Officer, who will endeavour to ensure that all personal data is processed in compliance with this Procedure.

Referral to the Information Commissioner's Office (ICO)

15. Nothing in this Procedure prevents a complainant from raising their concern directly with the Information Commissioner's Office (ICO). However, complainants are encouraged to follow this Procedure first.
16. The ICO may be contacted on 0303 12311113 or via www.ico.org.uk.

Confidentiality and Data Handling

17. Records of data protection complaints will be kept securely and confidential in accordance with the Scheme's Data Protection Impact Assessment, except where disclosure is required by law or regulation.
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DATA PROTECTION COMPLAINTS FORM

You can use this form to submit a complaint to us about how we have handled your personal data or responded to a request where you have exercised your data subject rights.

USRBS Trustees take their obligations under the UK GDPR and Data Protection Act 2018 seriously and welcome the opportunity to review concerns and, where appropriate, make things right. When we refer to 'personal data' we mean information that relates to you.

This form should not be used for a complaint that is not related directly to data protection matters. Complaints of a different nature are regulated by the USRBS Internal Dispute Resolution Procedure.

Collection of personal data

This form will collect your personal data, such as your name and contact details as well as the detail of your complaint. This will be used to process your complaint and respond to you. You can find out more about how we process personal data and your data protection rights in our Privacy Notice on the School's website.

1.	Please provide your name:	
2.	Please tell us whether you have engaged with the school in any of the following capacities, current or former (select any that are appropriate):	
	• Deferred member	
	• Employed deferred member	
	• Pensioner	
	• Widow or widower	
	• Dependant of pensioner or deferred member	
	• Other (<i>please provide details</i>)	
3.	Please provide your email address:	
4.	Please provide a summary of your concern(s) below, including dates and any information that will enable us to review and address your concern(s): <i>Max 500 words.</i>	

5.	What action(s) would you like to be taken to resolve your complaint? <i>Max 500 words.</i>	
6.	Have you previously contacted us in relation to this matter?	
	• Yes (<i>please provide details</i>)	
	• No	

Please send this form to: data@uppingham.co.uk

Or to the following address:

The Bursar
 Privacy and Compliance Officer
 Uppingham School
 20-24 High Street West
 Uppingham
 Rutland
 LE15 9QD