

Customer Relationships



watford
community
housing

Policies & Procedures

Data Protection Complaints Policy

1.	Policy Objectives
1.1	<p>The WCH Group is committed to handling Personal Data in accordance with data protection law. The aims of this Policy are to: -</p> <ul style="list-style-type: none">(i) provide guidance to WCH staff in dealing with any complaint made by a WCH Data Subject (as defined below) about our handling of their personal data; and(ii) ensure we engage with such complaints positively and proactively within our existing feedback management framework.
2.	Scope and definitions
2.1	Scope
2.1.1	<p>This Policy applies to all WCH Data Subjects (defined at section 2.2.3) and to all WCH activities or operations which involve the processing of Personal Data (as defined at section 2.2.1) regardless of its format. The Policy does not cover Data Subjects exercising their “information rights” (such as the right of erasure, the right to object to processing etc).</p>
2.1.2	<p>The Policy must be followed by anyone who processes Personal Data for, or on behalf of, the WCH Group.</p>
2.2	Definitions
2.2.1	<p><u>Personal Data</u>: information about an identified or identifiable living individual held on a computer or in a structured filing system (examples would include: names, contact information including emails and usernames, photographs, vehicle registration plates).</p>
2.2.2	<p><u>Processing</u>: anything you can do with Personal Data eg collecting, viewing, recording, organising, structuring, storing, altering, retrieving, sending, restricting or destroying it.</p>
2.2.3	<p><u>WCH Data Subject</u>: any living individual whom the Personal Data is about held by a data controller. The WCH Group has relationships with various Data Subjects including our tenants (and their household members), leaseholders, shared owners, private market tenants, job applicants, staff, Group Board and Board Committee members, Gateway Membership Team, contractors and suppliers.</p>
3.	Recognising a Data Protection Complaint

3.1	<p>A data protection complaint could be about any aspect of our Processing of a Data Subject's Personal Data but might commonly be about: -</p> <ul style="list-style-type: none"> - Processing that does not reflect WCH privacy notices; - Sharing Personal Data with/sending to an unauthorised person; - Processing beyond a WCH Retention Period; - Failing to keep Personal Data appropriately secure; or - Failing to comply with a data subject access request properly or in accordance with our Subject Access Request Policy & Procedure.
4. Raising a Concern About Data Protection	
4.1	<p>All feedback we receive is valuable. Customers can give us feedback in a number of ways:</p> <ul style="list-style-type: none"> - In person: To any member of our staff - By telephone: 0800 218 2247 / 01923 209000 - Online: www.wcht.org.uk/feedback - By email: feedback@wcht.org.uk - In writing to: Gateway House 59 Clarendon Road Watford Hertfordshire WD17 1LA
4.2	<p>We encourage customers raising any concern or complaint to outline what they feel would be a satisfactory resolution to the problem at the outset, so that everyone's clear about expectations.</p>
4.3	<p>We categorise customer feedback in three ways – as either general feedback (where the customer wishes to pass back comments or make us aware of an issue but not necessarily investigate or resolve it on their behalf) or as a complaint or as a compliment.</p>
5. Responding to a Data Protection Complaint	
5.1	<p>On receipt of any complaint about a data protection issue we will follow a two-stage procedure to investigate and seek to resolve the issue, following the usual timescales in our Customer Feedback Policy & Procedure (also available on our website).</p>
6. Data Subjects' Right to Complain to Information Commissioner's Office	
6.1	<p>Where a WCH Data Subject is dissatisfied with our handling of their complaint under section 4 they can at any time: -</p> <ul style="list-style-type: none"> (i) Contact the WCH DPO at our head office address (any correspondence addressed to our DPO received by a member of staff should be passed to the Company Secretary, Governance and Regulation Manager or Chief Technology Officer without delay); or (ii) Make a complaint with the ICO as the UK supervisory authority. The ICO's contact details are as follows: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire

	SK9 5AF (t) 0303 123 1113
6.2	In reviewing any Data Subject's complaint the ICO may advise the complainant to exhaust our complaints-handling procedure first. Complainants are therefore advised of this at Stage 1 of the Customer Feedback Procedure.
7.	Monitoring & Reporting
7.1	All data protection complaints shall be reviewed by the WCH DPO and their advice followed accordingly. The DPO shall review all other complaints on a quarterly basis and advise the Group as necessary to avoid the same or similar complaints arising in the future.
8.	Person responsible
	Customer Experience Manager
9.	Related documents
	Privacy Policy and WCH privacy notices Subject Access Request Policy Retention Policy Information Rights Policy Customer Feedback Policy and Procedure Personal Data Breach Policy
10.	Approval
	Approved by : Head of Customer Relationships
	Date of approval : 21 August 2019
	Review date : August 2022
	Policy 'owner' : Customer Experience Manager