

ICHP Complaints Policy

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Contents

Introduction.....	2
Our Responsibilities.....	2
Making a Complaint.....	2
Complaint Forums.....	2
What you can expect after submitting your complaint.....	3
How we will verify your identity	3
Complaints on someone else’s behalf.....	3
How we handle complaints internally	4
What you can do if you are not happy with our response or decision	5

Introduction

The Data Use and Access (“**DUA**”) Act 2025 introduces new formal obligations for organisations to effectively manage individuals’ (also referred to as “**Data Subjects**”) complaints. Due to the nature of our activities, Imperial College Health Partners (“**ICHP**” and “we”, “our” and “us”) are covered by the DUA Act and are required to duly respond to all complaints and ICHP is committed to fulfilling its obligations under the DUA Act.

In this Policy, you will find information on our responsibilities, on what you need to do if you want to make a complaint, how we handle complaints, and what you can expect after submitting your complaint. The Policy will also cover what you can do if you are dissatisfied with our response or decision taken in relation to your complaint.

Our Responsibilities

Our **Corporate Affairs Team** is the responsible party for this Policy and its implementation within ICHP.

However, **all ICHP Staff** will assume responsibility for identifying complaints, referring complaints to the Corporate Affairs Team for actioning and assisting them where necessary.

As ICHP’s outsourced Information Governance service, **Information Governance Services Ltd (“IGS”)** may support us and the Corporate Affairs Team with any complaints where necessary, including maintaining an up-to-date internal Record of Complaints.

Making a Complaint

Complaint Forums

As mentioned above, you have the right to make a complaint if you are unhappy with the way that ICHP has handled your personal data.

There is no specific method you are required to use. You may submit your complaint using any of the means described below. Please provide sufficient detail to help us understand your concern and respond effectively.

- **Online Contact Form:** You may complete the electronic contact form available on the “Contact Us” page of the ICHP website [here](#). Although the form is primarily intended for general enquiries and collaboration requests, it can also be used to submit data protection complaints.
- **Email:** You can email your complaint to this email address: ea@imperialcollegehealthpartners.com. Please include the subject line: Data Protection Complaint.
- **Post:** You may write to us at:

Imperial College Health Partners
15 Marylebone Road

London
NW1 5JD

What you can expect after submitting your complaint

When we receive your complaint, we will send you an acknowledgment of receipt first.

We will acknowledge receipt of all data protection complaints as soon as reasonably possible and no later than **30 calendar days** beginning on the day after we receive the complaint. If the final day of the acknowledgement period falls on a non-working Day, the deadline will be extended to the next working day.

The format of our acknowledgement will depend on how we receive your complaint (for example, by email, post, or online form).

Our acknowledgement of receipt will include:

- Confirmation that we have received your data protection complaint and that it is under review
- An outline of the steps we will take to handle your complaint
- Information about the next stages of the process and when you can expect further updates
- Contact details for a designated point of contact within ICHP should you have any follow-up questions or require further information.

How we will verify your identity

Where necessary, we will take steps to verify your identity before progressing your complaint.

If your complaint requires us to process or disclose personal data, it is important to ensure that such data is not disclosed to the wrong individual. To prevent this, we may ask you to provide a copy of one or more of the following forms of identification:

- A valid passport
- National ID card
- Driving license
- A recent utility bill (such as bank, financial, or tax statements).

We may request additional information where necessary to verify your identity. However, we will only ask for information that is strictly necessary for verification purposes and will do so without undue delay.

Complaints on someone else's behalf

If an individual (such as a family member or solicitor) makes a complaint on someone else's behalf, we need to check that they are legally authorised to do so. We will request appropriate evidence of such authority, which may include:

- A valid power of attorney
- A letter of authority signed by the individual they are acting on behalf of.

Importantly, if there is no evidence that a third party is authorised to act on someone’s behalf, then ICHP is **not** required to investigate the complaint. However, we will respond to them explaining this position.

How we handle complaints internally

At ICHP, we are dedicated to deal with your complaint in compliance with the DUA Act. As such, we have set up an internal procedure to meet the legal requirements.

Here is an overview of the internal process divided into six different stages:

Stages	Actions
<p>Stage 1: Acknowledgement of Receipt</p>	<p>Once a complaint has been identified by a member of staff, it will be passed onto the Corporate Affairs Team without undue delay.</p> <p>The complaint will be recorded on ICHP’s Record of Complaints with all relevant information included.</p> <p>The Corporate Affairs Team will send an acknowledgment of receipt to you no later than 30 calendar days from the day after receipt of the complaint.</p>
<p>Stage 2: Complaints Review</p>	<p>The Corporate Affairs Team will then enquire into the complaint without undue delay.</p> <p>The Corporate Affairs Team will gather as much information as is needed, including:</p> <ul style="list-style-type: none"> • Examining all the relevant facts thoroughly, fairly, and accurately • Speaking to relevant members of staff • Comparing the information from the complaint with the information held by ICHP • Checking that ICHP has upheld its own internal terms, policies and standards. <p>If necessary, the Corporate Affairs Team may contact you to request further information.</p>
<p>Stage 3: Communication of Progress Updates</p>	<p>The Corporate Affairs Team will keep you updated about the progress of the review.</p> <p>If the Corporate Affairs Team determines that the review is likely to continue for an extended period, they will communicate this to you. ICHP endeavours to action and provide a response to data protection complaints without undue delay.</p>

<p>Stage 4: Actioning and Response to Complaint</p>	<p>Once the review is complete, the Corporate Affairs Team will provide an outcome to you.</p> <p>This will involve a response including:</p> <ul style="list-style-type: none"> • A clear explanation of what ICHP has done to resolve the data protection complaint • Any resulting actions that ICHP has taken • Details about how ICHP has reached its conclusion • Information about the individual’s right of further complaint to the Information Commissioner’s Office (“ICO”), as well as the regulator’s contact details for doing so.
<p>Stage 5: Post-Complaint Review</p>	<p>Once ICHP has provided you with an outcome, ICHP staff members, together with the Corporate Affairs Team, will review what occurred and consider whether there is anything to learn or improve on to prevent future complaints.</p>
<p>Stage 6: Closing the Complaint</p>	<p>ICHP will keep evidence of its approach to each complaint it receives in a Record of Complaints, as required by law. This will be retained for a set period, and then eventually deleted securely.</p>

What you can do if you are not happy with our response or decision

If you remain dissatisfied after receiving our response to your complaint, you can submit a complaint to the ICO at:

Information Commissioner’s Office,
Wycliffe House,
Water Lane,
Wilmslow,
Cheshire,
SK9 5AF.

You can also submit a complaint to the ICO online following the steps under this [link](#).